

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----*
NXIVM CORPORATION, formerly known as
EXECUTIVE SUCCESS PROGRAMS, INC. And
FIRST PRINCIPLES, INC.,

No. 2:06-cv-01051

Plaintiffs, (DMC/MF)

vs.

MORRIS SUTTON, ROCHELLE SUTTON, THE
ROSS INSTITUTE, RICK ROSS a/k/a "RICKY"
ROSS, STEPHANIE FRANCO, PAUL MARTIN,
Ph.D., and WELLSRING RETREAT, INC.,
Defendants.

-----*
RICK ROSS,
Counterclaim-Plaintiff,

vs.

KEITH RANIERE, NANCY SALZMAN,
KRISTIN KEEFFE INTERFOR, INC.,
JUVAL AVIV, ANNA MOODY, JANE DOE
and JOHN DOES 1-10,

Counterclaim-Defendants.

-----*
(Caption continued on following page)
CONFIDENTIAL
VIDEOTAPED DEPOSITION OF: KEITH A. RANIERE
(Volume II)
DATE TAKEN: THURSDAY, MARCH 12, 2009

COMPUTER-AIDED TRANSCRIPT PREPARED BY:
FITZSIMMONS REPORTING & VIDEOCONFERENCE CENTER
570 West Mount Pleasant Avenue
Livingston, New Jersey 07039
PHONE: (973) 994-3510
FAX: (973) 994-3621

1 APPEARANCES (Continued) :

2
3 DRINKER BIDDLE & REATH LLP
BY: ROBERT M. LEONARD, ESQ.
-and-
4 THOMAS F. CAMPION, ESQ.
5 500 Campus Drive
Florham Park, New Jersey 07932-1047
(973) 549-7370
6 Attorneys for Keith Raniere
7 RIKER DANZIG SCHERER HYLAND PERRETTI LLP
BY: HAROLD L. KOFMAN, ESQ.
8 Headquarters Plaza
One Speedwell Avenue
9 Morristown, New Jersey 07962-1981
(973) 538-0800
10 Attorneys for Morris Sutton and
Rochelle Sutton

11 LOWENSTEIN SANDLER PC
12 BY: PETER L. SKOLNIK, ESQ.
-and-
13 THOMAS S. DOLAN, ESQ.
14 65 Livingston Avenue
Roseland, New Jersey 07068
(973) 597-2508
15 Attorneys for The Ross Institute, Rick Ross,
Paul Martin and Wellspring Retreat, Inc.

16 FRIEDMAN KAPLAN SEILER & ADELMAN LLP
17 BY: ROBERT S. LANDY, ESQ.
18 1633 Broadway
New York, New York 10019-6708
(212) 833-1100
19 Attorneys for Interfor, Inc., Juval Aviv
20

ALSO PRESENT:

21 Nancy Salzman
22 Rick Ross
23 Karl Petry, Videographer
24
25

1 (Continued)

2
3 INTERFOR, INC., JUVAL AVIV, and
ANNA MOODY,

4 Cross-Claimants,

5 vs.

6 NXIVM CORPORATION, KEITH RANIERE,
7 NANCY SALZMAN and KRISTIN KEEFFE,
8 Cross-Claim Defendants.

9
10
11 T R A N S C R I P T of the stenographic
12 notes of the proceedings in the above-entitled
13 matter, as taken by and before CHERYL McGANN, a
14 Certified Court Reporter and Certified Realtime
15 Reporter of the State of New Jersey, held
16 at the offices of DRINKER BIDDLE & REATH LLP,
17 500 Campus Drive, Florham Park, New Jersey, on
18 Thursday, March 12, 2009, commencing at
9:44 a.m.

19
20 APPEARANCES :
21 TOMPKINS MCGUIRE WACHENFELD & BARRY LLP
BY: WILLIAM B. MCGUIRE, ESQ.
22 4 Gateway Center
100 Mulberry Street
23 Newark, New Jersey 07102
Attorneys for Plaintiffs and Cross-Claim
24 Defendants, NXIVM Corp., Nancy Salzman
and Kristin Keefe
25

1 I N D E X
2 WITNESS DIRECT CROSS REDIRECT
(Continued)
3 KEITH ALAN RANIERE
By Mr. Kofman: 169
4 By Mr. Landy: 285
By Mr. Skolnik: 345
5

6 E X H I B I T S
7 Exhibit Description For Identification
8 Raniere-11 Affidavit of Keith Raniere signed
August 22, 2003, with Exhibits 208
9 Raniere-12 First Principles' Third Amended
Responses to Defendant Stephanie
10 Franco's Second Set of Interrogatories
to First Principles 239
11 Raniere-13 12 Point Mission Statement Bates
12 stamped SF 00329 245
13 Raniere-14 3/1/04 five-page memorandum to K.
Raniere, N. Salzman from J. O'Hara 251
14 Raniere-15 Student Enrollment Application for
15 Aaron Kassim 264
16 Raniere-16 Keith Raniere's Responses to Defendant
Rick Ross' First Amended Set of
17 Interrogatories to NXIVM 324
18 Raniere-17 Excerpt From Audio Recording of Meeting
Among Rick Ross, Juval Aviv, and Lynne
19 Friedman on November 23, 2004 330
20 * * *

21 (Exhibits attached.)
22 INFORMATION REQUESTED
23 (Request.) Page 215
(Request.) Page 221
24 (Request.) Page 222
(Request.) Page 278
25 (Request.) Page 281

Page 169

1 THE VIDEOGRAPHER: Today's date is March 12, 2009.
2 This is the start of Tape 1 of the second day of the
3 continuing deposition of Keith Raniere. The time is
4 9:44, and we are now on the record.

5
6 KEITH ALAN RANIERE, residing at
7 3 Flintlock Lane, Clifton Park, New York 12065,
8 is duly sworn and testifies on his oath as follows:
9

10 CONTINUED DIRECT EXAMINATION BY MR. KOFMAN:

11 Q. Good morning, Mr. Raniere. The rules that I
12 told you at the beginning of the deposition
13 yesterday are still in effect.

14 Do you need me to repeat those for you?

15 A. No.

16 Q. Okay. Mr. Raniere, has Morris Sutton taken
17 any action since the filing of the lawsuit to
18 discredit NXIVM?

19 A. I don't know.

20 Q. Okay. Has Rochelle Sutton taken any action
21 since the filing of the lawsuit to discredit NXIVM?

22 A. I don't know.

23 Q. Has Stephanie Franco taken any action
24 subsequent to the filing of the lawsuit in August
25 2003 to discredit NXIVM?

Page 171

1 reveal all the things relating to B and all the
2 things relating to B -- C. Certainly as a group we
3 can reveal a trade secret. Certainly as an essay,
4 although a trade secret may not be contained in any
5 one segment, it provides more and more of a window
6 so it's something that I would have to think about
7 in each case.

8 Q. Do you think that your marking up of
9 Raniere-5 and Raniere-6 you identified things that
10 you now believe are not trade secrets, or is it the
11 case that you --

12 A. Did not mark enough --

13 Q. -- didn't mark up things that you consider
14 are trade secrets?

15 A. Probably did not mark enough, maybe should
16 have marked more. Each of the things have to be
17 weighed very carefully, so I may have marked some
18 things that are not.

19 I will give you an example. There are quotes
20 in these articles from other people, other things.
21 The question is can you use a quote from another
22 person to reveal a secret. Can I -- if I have a
23 math equation, can I use an equation from another
24 mathematician to reveal a secret; and the answer is
25 yes. So I have to weigh specifically how each of

Page 170

1 A. Um, I'm not sure.

2 Q. Yesterday before we broke you had -- I had
3 asked you to mark up the article that we've marked
4 as Raniere-8, Critical Analysis of the Executive
5 Success Programs Inc., to identify everything that
6 you considered a trade secret of NXIVM.

7 Have you done that?

8 A. Yes, with a comment.

9 Q. What's the comment?

10 A. As I was doing it, I am having a different, I
11 would say deeper understanding of the issue, so I
12 can't say that on the previous articles that I
13 marked up that I've yet marked them appropriately
14 ultimately. I think to do a -- this full justice, I
15 would need to not only think about it but go through
16 each one very carefully over time. And I can give
17 you specifics of why.

18 Q. If you can give me a specific as to why you
19 would have to do that.

20 A. Because when you have -- if I have some sort
21 of a trade secret -- let's say it's some sort of a
22 math formula involving A, B and C, and I go and I
23 give that trade secret formula to several people,
24 and I have one person reveal A and another -- all
25 the things relating to A -- and another person

Page 172

1 these quotes are used, and it starts to become more
2 than just sitting casually or at a deposition
3 formally and quickly marking off. For me, it is --
4 it is a thought process.

5 Q. How long do you think it would take you to
6 identify all of the trade secrets that are disclosed
7 in Raniere-5?

8 A. I think it depends how motivated I was. If I
9 was a motivated competitor, it might take me a year,
10 but I'd figure it out.

11 Q. You would be able to replicate the Rational
12 Inquiry -- the NXIVM courses from simply this one
13 article?

14 A. I might be able to replicate a trade secret
15 from one or more of the articles, and I can't tell
16 you that, per se.

17 Q. So you might be able to replicate a single
18 trade secret from one of the articles if you took a
19 year?

20 A. Or more. Or more.

21 Q. But it might take a year if you were
22 motivated?

23 A. Or it might take a night. I don't know.
24 What I'm saying is it's a far deeper process than
25 my on reading the article just checking off yes, no,

Page 173

1 yes, no, yes, no.

2 Q. Okay. How long would it take you, Keith
3 Raniere, to perform a more detailed analysis to
4 identify each and every trade secret disclosed in
5 Raniere-5?

6 A. I have no way of knowing that.

7 Q. Hours, days?

8 A. You're asking how long it would take me to
9 solve a problem that I don't know the solution of.
10 I don't know.

11 Q. It's a three-page article, Mr. Raniere. How
12 long would it take you to identify each trade
13 secret?

14 A. It's a three-page article that provides a
15 window into 30 years of my life of work. I don't
16 know.

17 Q. You understand in this case NXIVM is going to
18 have to identify each trade secret?

19 A. Yes, but not necessarily how the trade secret
20 is specifically represented in the article. I
21 believe it's do the articles/article, however you
22 look at them, release the trade secrets to
23 competitors. Do they -- or are those trade secrets
24 used to damage NXIVM. And I don't understand the
25 level -- that's my understanding of it, and that's a

Page 174

1 different question than does this sentence contain
2 a trade secret, at least in my mind. So I went
3 through this, and I apologize that it may not be as
4 complete.

5 Q. Okay. But to the extent it's not complete,
6 it's more likely underinclusive than overinclusive
7 of trade secrets?

8 A. More likely.

9 Q. How about the third article? Did you -- does
10 that identify -- and this is what you did last
11 night, Raniere-8.

12 A. That's the one I'm speaking of, yes.

13 Q. Does that identify each and every trade
14 secret that's contained in the article?

15 A. No. It just starts with an overview. I
16 spent, I don't know, 15 minutes, a half hour going
17 through, as I did the other articles with about the
18 same level of precision; but even with this article
19 I learned more as I was doing it.

20 Q. Did anyone assist you in marking up or
21 identifying trade secrets in Raniere-8?

22 A. No.

23 Q. Mr. Raniere, is any entire trade secret of
24 NXIVM, as you define the term, disclosed in these
25 articles -- in any one of these articles?

Page 175

1 A. I don't know.

2 Q. And that's after having spent some time
3 yesterday reviewing the articles?

4 A. Yes.

5 Q. Let's go back to Raniere-5.

6 A. (Witness complies.)

7 Q. The next to last paragraph there you say
8 "Participants are told to promise not to tell non-
9 participants of what they learn in the Intensive, as
10 well as its methods," and you underlined that.

11 A. You have to show me that. It's the very last
12 page where --

13 Q. No. It's the first page of Raniere-5, next
14 to last paragraph, under the heading "Limitations in
15 ability to get feedback from friends and family."

16 A. Uh-huh.

17 Q. And it says, "Participants are told to
18 promise not to tell non-participants of what they
19 learn in the Intensive, as well as its methods."

20 What is unique to NXIVM about that concept?

21 A. Please repeat the concept. I'm having
22 trouble finding.

23 Q. Okay. It's -- the heading is "Limitations in
24 ability to get feedback from friends and family."

25 A. I'm not seeing -- it's Page 1?

Page 176

1 Q. Page 1.

2 A. I see. So it's the paragraph above the last.

3 Q. And you underlined part of the sentence,
4 "Participants are told to promise not to tell
5 non-participants of what they learn in the
6 Intensive, as well as its methods."

7 A. Uh-huh.

8 Q. What about that sentence is unique to NXIVM?

9 A. "Methods" right off.

10 Q. The word methods is unique?

11 A. No, NXIVM's methods; and this brings the
12 methods not only into question but starts to carve
13 out aspects of or not of the methods.

14 Q. Does it disclose any of the methods?

15 A. I believe indirectly it does. It starts to.

16 Q. How?

17 A. I think when you have a trade secret, as
18 Mr. Hochman did, you are in a different position
19 than if you don't. And if I start to say things
20 about the trade secret that I have and I have the
21 trade secret, so to speak, everything starts to
22 either hint or directly say.

23 Now, he's talking about the methods, the
24 trade secrets that he has in his hand. He's
25 starting to go and say, all right, well, it's sort

1 of like this, sort of not like this. So I find it
2 related to our methods, and I find our methods trade
3 secrets.

4 Q. Could --

5 A. I'm sorry.

6 Q. Could a competitor take that sentence and
7 replicate or discover any of your trade secrets?

8 A. Utilizing that sentence in combination with
9 other things, I believe so.

10 Q. Doesn't that sentence merely say that you
11 have methods?

12 A. No. It says actually more than that, too.
13 It talks about a promise. It talks about an
14 Intensive and that the Intensive does have methods,
15 which sometimes methods are not trade secret;
16 sometimes they are.

17 Q. Is the promise to keep things secret unique
18 -- to keep information secret unique to NXIVM?

19 A. No.

20 Q. Is there anything about the existence of that
21 promise to -- strike that.

22 Are you aware of any competitors who have
23 similar promises?

24 A. Not directly, but I'm sure they do.

25 Q. Uh-huh. Does disclosure of the fact that

1 trade secret formulas probably have carbon in it.
2 To say that the formula has carbon in it, a lot of
3 competitors have carbon in their formula, but it is
4 significant when I know the trade secret and I say
5 the formula has carbon in it. It starts to craft
6 out information.

7 And can I contemplate what every person,
8 every competitor looking at this will be able to
9 derive from it? That would take a lot of time, and
10 I don't know if I could even necessarily do that.

11 Q. Let's assume that your trade secret was a
12 cake. Is -- somebody saying that the cake contains
13 eggs, is that a disclosure of a trade secret?

14 A. It can be partway to one, especially if the
15 eggs are in the recipe.

16 Q. If the eggs are in the recipe, okay.

17 By the way, is there anything that's
18 contained in the NXIVM Intensive, any of the modules
19 that have been created for the NXIVM Intensive that
20 are not trade secrets?

21 A. The modules is a combination of the product
22 of the tool and the tool itself. Are there any
23 modules in NXIVM that do not -- are not related in
24 any way to the trade secret? I don't think so.

25 Q. Is there anything within an individual module

1 NXIVM requires its information to be kept secret --
2 strike that.

3 Would disclosure to a competitor of the fact
4 that NXIVM requires its methods to be kept secret
5 work a competitive disadvantage on NXIVM?

6 A. It may, depending on the context.

7 Q. A competitor learns that NXIVM won't --
8 doesn't allow its participants to reveal the trade
9 secrets. How does that work a competitive
10 disadvantage on you?

11 A. If I am a person that is looking to find the
12 trade secrets of an organization or if I am a person
13 that is a competitor of the organization and has the
14 trade secrets, I could use those trade secrets to,
15 in fact, take business away from NXIVM, to cause
16 harm to NXIVM or I could use the hints in part to
17 derive.

18 Q. How does learning that NXIVM prohibits
19 disclosure of its trade secrets benefit a
20 competitor?

21 A. I don't know off the top of my head. I --
22 you know, it's similar -- if the equation is A plus
23 B plus C, that is my trade secret, and many
24 competitors have A in their equation. Any formula,
25 a chemical formula, say, has carbon in it. Many

1 that -- any part of an individual module that's not
2 a trade secret?

3 A. Do you know, I can't say that off the top of
4 my head. I can't think of one. Part of the
5 philosophy is we wouldn't create the modules;
6 someone else would.

7 Q. I'm sorry. Could you repeat that?

8 A. Part of the philosophy of it is if they
9 weren't valuable to us, we wouldn't create them;
10 someone else would.

11 Q. On the last paragraph of this page, it says
12 "Participants are mislead" -- you underlined,
13 "Participants are mislead into feeling guilty for
14 being a 'promise breaker.'"

15 A. Uh-huh.

16 Q. What's unique to NXIVM about that concept?

17 A. Well, it does raise a question. Are
18 participants made to feel guilty? I think the way
19 we understand guilt is unique. I think the way it
20 is handled within the curriculum is unique and
21 important and secret, and also I believe the
22 statement is untrue and I think raises the question
23 that either it makes us look bad or we have to start
24 to reveal a trade secret, which is an interesting
25 thing when you don't get to publish.

1 Q. Consid -- is there something in that sentence
2 that would tell a competitor what your ideas of
3 guilt are?

4 A. I think there are things in that sentence
5 that, one, a competitor would understand that
6 certain characteristics relating to the NXIVM trade
7 secrets and relating to NXIVM; and, two, it would
8 put a potential client and other competitors in a
9 position where either -- especially when you talk
10 about our clients -- either they believe something
11 wrongfully about us by someone who has the authority
12 of having our trade secret or we have to reveal a
13 trade secret to explain.

14 You see, we do not have the right to first
15 publication in this case. So although it may seem
16 like a criticism, this particular article, it's
17 criticizing something that doesn't exist for the
18 public yet so we're -- it's a type of forced
19 publication almost or a damage.

20 Q. You said it doesn't exist for the public yet.
21 Is there a plan to have this -- eventually have the
22 modules made public?

23 A. I don't know.

24 Q. Would a -- would some potential student who
25 read these articles be able to say, I don't need to

1 take the course now because I learned everything I
2 need from these three articles?

3 A. They might say that.

4 Q. Would they get the gist of NXIVM's programs
5 from reading these three articles?

6 A. I don't know.

7 Q. Top of the second page, under Effect of
8 idiosyncratic vocabulary on communications, you
9 underlined the phrase --

10 A. Hold on. I'm trying to find it.

11 Second page. What paragraph? Effect -- oh,
12 it's the first paragraph.

13 Q. First full paragraph.

14 A. Thank you.

15 Q. You underlined the phrase, "English words are
16 redefined to fit the peculiar meanings of group
17 leaders."

18 A. Uh-huh.

19 Q. "The result is communications that are near
20 incomprehensible to outsiders."

21 Does that sentence -- that sentence doesn't
22 appear in any of NXIVM's modules, does it?

23 A. One of our important things is to understand
24 the meanings of words going from surface structure
25 to deep structure, and the way we do that is

1 important, and understanding comprehensibility is
2 important. I think this starts to say what trade
3 secrets are. That's a part. That's not the whole
4 thing. The whole trade secret isn't there, no.

5 Q. Is any trade secret there?

6 A. I believe that there is part of a trade
7 secret there, the beginnings. I think that that,
8 if used in an appropriate context, could ascertain
9 trade secrets.

10 This is a person who has our trade secret.
11 They're writing from that perspective with a group
12 of other people.

13 Q. So somebody saying I've read the materials,
14 they're gibberish, reveals a trade secret?

15 A. Well, it either reveals part of a trade
16 secret if it's true or if it's false it puts it in
17 a position where we either have to reveal the trade
18 secret to capture whatever market we want or be
19 damaged by it.

20 Q. But that's a difference between whether it's
21 true or false, as opposed to whether it discloses a
22 trade secret. The fact that somebody says it's
23 gibberish may be true, may be false, may be
24 somebody's opinion but how does -- how does saying
25 that it's a bunch of nonsense allow anyone to get a

1 competitive advantage over NXIVM?

2 A. As I -- well, maybe I wasn't clear.

3 If the statement is true, it gives them a
4 competitive advantage by the theory of it starts
5 to give or it may give all of the trade secret,
6 depending on the statement or part of the trade
7 secret away, especially if it's with a group of
8 people who have taken the trade secrets and are
9 bringing them out to the public.

10 If the statement is false, it has the same
11 effect in a different way. Assuming that the
12 statement is either true or false, both bringing the
13 trade secrets either out to the public or hurt us
14 with the very trade secrets.

15 Q. Okay. Looking at the idea of a competitor,
16 is it your understanding that a competitor would
17 read this and say, boy, if I could spew nonsense, I
18 could be as successful as NXIVM?

19 A. Can -- would you mind defining what you mean
20 by a competitor?

21 Q. Somebody who wanted to -- well, how do you
22 define competitor?

23 A. I didn't use it in the question.

24 Q. Okay. Would somebody who was looking to do
25 human potential training -- what would you say is

1 the business of NXIVM?

2 A. I would say the business of NXIVM is
3 increasing joy.

4 Q. Okay. Would somebody else who's looking to
5 increase joy say to themselves after reading this
6 article -- strike that.

7 So is any compe -- is a competitor of NXIVM
8 any other group that looks to increase joy?

9 A. I'm not a -- a lawyer. I would think that in
10 a broad sense, that could be, because the reason why
11 people come to NXIVM it is my belief is to increase
12 joy either very directly or ultimately. So that's a
13 quick definition.

14 Q. Okay. Would somebody -- another group that's
15 looking to make money by increasing joy be able to
16 say to themselves after reading that sentence, if I
17 spout gibberish, I can take some of NXIVM's business
18 away?

19 A. I think they might say, if I spout gibberish,
20 utilizing the other things in these articles, I
21 might be able to or I might be able -- because NXIVM
22 is spouting gibberish and they're doing that, but
23 second of all, if I have the trade secret -- and
24 maybe I am a competitor -- it is using the trade
25 secret against us to take business away.

1 Q. Next paragraph, "Pre-emptive neutralization
2 of criticism of the group by participants and their
3 family/friends early on."

4 You -- about halfway through that you --
5 the sentence is, "Since it is likely that group
6 outsiders will perceive aspects of the group's
7 activities as 'manipulative' or as a 'cult,' these
8 two words are used as the sole examples of 'abstract
9 terms' that a Shifter will use."

10 How is that a trade secret under your
11 definition?

12 A. Well, things relating to what we term as
13 shifter strategies or a person who uses them may be
14 called a shifter; and things like manipulative and
15 cult, amongst other things, are discussed. This is
16 beginning to say what is discussed, beginning to say
17 how it is discussed. I suspect that with a few
18 other sentences, there could be more trade secrets
19 revealed or more of the trade secrets revealed.

20 Q. Mr. Raniere, can someone make an informed
21 criticism of NXIVM without revealing its trade
22 secrets?

23 A. Absolutely.

24 Q. How could that be done? Somebody who is
25 taking the course, can they make a criticism without

1 revealing the trade secrets?

2 A. Yes. Otherwise, I would have not only
3 underlined every paragraph here, but you have to
4 assume that the people that take NXIVM for the most
5 part are not competitors and they are -- they won't
6 compete with NXIVM. There is a noncompete, and
7 given that they're noncompetitors and given that
8 they don't have all of the trade secrets or even if
9 they did have all of the trade secrets, if they
10 wrote certain criticisms, it would be fine.

11 Q. Let's say I took a 16-day Intensive, didn't
12 like it, wrote an article or posted a blog entry
13 that said, you know, "I took this class called NXIVM
14 and I read the materials that they gave me; and it
15 was just gibberish. They redefine words in their
16 own idiosyncratic ways."

17 A. Uh-huh.

18 Q. Does that reveal a trade secret?

19 A. Are you a competitor, first of all?

20 Q. I'm writing an arti -- I'm putting an article
21 on the Internet or in a newspaper where anyone can
22 see it.

23 A. Well, it may or may not start to reveal the
24 trade secrets.

25 Q. And if I write in the article, "Go look for

1 joy somewhere else 'cause this program really
2 stinks. The words are gibberish," is that -- that
3 might start to reveal a trade secret?

4 A. It may start to. The reason why I'm being
5 hesitant is I'm not -- as I said, I would have to
6 think about this even more. I know that through
7 these articles and many of these statements, there
8 is a constructive revealing of the trade secrets.

9 You asked me to take each statement and
10 assess it and what I would say assess it
11 superficially and underline it or not, and I assumed
12 you wanted me to underline generously as opposed to
13 leaving out. Part of what you asked is which way it
14 went, and I did so. But, you know, just like with
15 anything, it needs to be thought out.

16 Q. If I were to put in my blog entry, "You know,
17 I took this NXIVM class and you know what? I know a
18 way of increasing your joy. Save your \$7500 and
19 don't take this nonsense," does that make me a
20 competitor?

21 A. No, not necessarily. I'm not sure. It
22 depends. Are you selling that? Are you earning
23 money from that?

24 Q. I'm just warning people off.

25 A. Well, you're probably not a competitor, but

Page 189

1 I'm not sure. I mean, competitors can warn other
2 people off of other competitors and still earn
3 position that way. I mean, I think a competitor
4 can destroy another competitor before they even come
5 into the market. You know, I suspect if you did
6 something like that and maybe you did it so
7 effectively that you stopped all people from coming
8 to NXIVM; and NXIVM, you know, was moribund, had no
9 business, and then you hung a shingle and opened up
10 a business just like NXIVM, I would suspect I would
11 think you were a competitor even though at the time
12 you were doing it you weren't earning from it.

13 Q. Could I disclose a trade secret if I'm not a
14 competitor?

15 A. Yes, I think so.

16 Q. So if I were to write, "Don't take NXIVM's
17 classes. They make you bow down to this guy named
18 Vanguard," is that disclosing a trade secret?

19 A. Repeat the sentence. You're asking me to
20 evaluate on a sentence-by-sentence basis and,
21 honestly, I don't feel capable of giving you a
22 complete evaluation. You know, our competitors who
23 look to take our trade secrets just don't take a
24 single sentence and sit and say, oh, yeah; oh, no.
25 They'll think about it, maybe think about it for

Page 190

1 years. I believe our noncompete clause is three or
2 five years or something like that.

3 Q. Do you know of any competitors who are
4 looking to take your trade secrets?

5 A. I believe so.

6 Q. Who?

7 A. It depends how you define competitor.

8 Q. Well, how do you define competitors who are
9 looking to take your trade secrets?

10 A. Well, I believe Rick Ross is a competitor.
11 I believe John Hochman is a competitor. I believe
12 Paul Martin is a competitor. I believe that Tony
13 Robbins is a competitor. As a matter of fact, if
14 someone is, for example, a therapist or a
15 psychiatrist, they go through a different entrance;
16 and we do treat them as a competitor.

17 John Hochman is a psychiatrist.

18 Q. Is Tony Robbins trying to take your trade
19 secrets?

20 A. I don't know if he's trying to take our trade
21 secrets. I suspect if he thought they were valuable
22 he would -- you know, I don't want to make an
23 evaluation on Tony Robbins' honesty or dishonesty.
24 I don't think he is out to steal trade secrets, but
25 he may not even realize they're trade secrets if

Page 191

1 they were given to him, and he may use them.

2 Q. Do you know one way or the other whether he
3 knows you exist?

4 A. I think he does know we exist, but I'm not
5 sure. Yeah.

6 Q. Did you ever take any classes with Tony
7 Robbins?

8 A. No.

9 Q. Okay. Next to the last page, carrying over
10 to the last page of this article --

11 A. Yeah.

12 Q. -- says -- you underlined the sentence, "All
13 of this is soft peddled to participants as analogous
14 to calling your dentist (who finished a universally
15 recognized course of study) by the title 'doctor.'"

16 A. Uh-huh.

17 Q. What makes that -- what trade secret is being
18 disclosed by that sentence?

19 A. That's relating to certain things I think
20 within Rules and Rituals. Again, it is a fragment.
21 I need to clarify that. You know, I think it's a
22 highly effective strategy. If someone is
23 malintended, if I'm a competitor of you and I have
24 your trade secrets, instead of using the trade
25 secrets myself I just release them to another one of

Page 192

1 your competitors and let them destroy you, and I
2 never use them. So when you release things or
3 parts of things, it can be very damaging.

4 Q. Okay. Let's put Raniere-5 aside for now and
5 go on to Raniere-6, which is Robert Jay Lifton's
6 eight criteria of thought reform as applied to
7 Executive Success Programs.

8 You highlighted the next to last paragraph
9 concerning phone tree.

10 MR. McGUIRE: Page 1.

11 A. Page 1.

12 Q. Page 1. I'm sorry.

13 A. Yes.

14 Q. Is the idea of having a phone tree unique to
15 NXIVM?

16 A. I'm not sure. This is a quote right out of
17 one of the manuals it appears.

18 Q. Uh-huh, but is the concept of a phone tree
19 unique to NXIVM?

20 A. I think potentially the way NXIVM does it
21 maybe. If --

22 Q. Just the fact that there's a phone tree that
23 NXIVM uses, you're not claiming that that's unique,
24 since, after all, my son has a phone tree when his
25 school is cancelled.

1 A. Uh-huh, that's true. I am in part, and the
2 reason why I put this, this is a quote out of the
3 manual. This particular author, Paul Martin, took
4 the only thing that I wrote which was the Mission
5 Statement and copied 55 percent of it in parts.

6 I think I could copy a whole confidential
7 manual if you just give me enough article space and
8 I keep on releasing quote after quote. I think if I
9 released the whole manual, I could give away the
10 trade secrets. So every quote in here out of our
11 manual released from someone who has our trade
12 secret manual, and when that information is not
13 supposed to be released potentially leads to the
14 release of a trade secret. There are a lot of
15 quotes in here.

16 Q. If I read this paragraph, would I be able to
17 say -- and I'm a competitor, Tony Robbins, let's
18 say -- I say, oh, they've got a phone tree and each
19 -- whatever the paragraph says, would I be able to
20 say, Aha, I've got it? I can replicate NXIVM?

21 A. You start to have an understanding, and
22 depending on what other information you have, this
23 paragraph might be the final piece, certainly.

24 Q. Okay. The paragraph after that the only word
25 you underlined is "leased."

1 Does that paragraph contain a trade secret?

2 A. It probably does. It is in quotes, and I
3 wasn't sure if that was a quote. I think it was a
4 quote off the application; and in that case it's not
5 a problem because it's not from the trade secret
6 secretive material, but I was unsure, so I lightly
7 did that.

8 Q. By the way, just going quickly back to
9 Ranieri-5, is there anything from there -- any of
10 the trade secrets that are -- you claim are
11 disclosed in that article that are from the
12 Facilitator materials that were given to Stephanie
13 Franco?

14 A. Hard to tell.

15 Q. And that's because he doesn't cite where
16 different things came from?

17 A. Well, it's also hard to tell how these pieces
18 will add together as someone is unraveling what the
19 trade secrets are.

20 Q. Okay. Looking back at Ranieri-6, sir, you
21 have the statement about halfway down -- the quote
22 is from the section Money.

23 A. The direct -- well, halfway down which -- I'm
24 sorry, which page?

25 Q. Page 2?

1 A. Page 2.

2 Q. Yeah.

3 A. And this is Ranieri-6?

4 Q. Yes.

5 A. Okay. Money, yes.

6 Q. And it's your understanding that those
7 concepts there are unique to NXIVM?

8 A. There's more than the concepts here. First
9 of all, this is a quote. Second of all, this is not
10 only each of the concepts but their specific order
11 and as that order integrates together, and these are
12 some of the things that are -- this may be even all
13 of the things in that portion of the module.

14 Q. Then looking at Number 8 under or in the
15 quote from Money, it says, "Having money brings out
16 the true nature of people."

17 A. Uh-huh.

18 Q. Is that an idea that's unique to NXIVM?

19 A. Do you believe that that idea has to be
20 unique to NXIVM to be a trade secret?

21 Q. I'm -- your definition of trade secret used
22 the word unique.

23 A. Uh-huh. I believe that's part of a unique
24 idea. I believe the order of these concepts is
25 unique, and I believe just like any message -- you

1 know, I can give you a trade secret and suppose I
2 have a formula in organic chemistry, I can of course
3 look at the formula and say is the letter C unique,
4 and you would have to say no; say is carbon unique,
5 and you'd have to say no. But this gives not only
6 carbon and it does say that carbon is in the formula
7 which is starting to give away the trade secret that
8 starts to give the order and the nature, and part of
9 the trade secrets are not just the information
10 presented. It's the order. It's sometimes the
11 order of the words within a question specifically.
12 Sometimes it's the orders of the questions within a
13 module. It is definitely those things and the order
14 of module within a curriculum and the order of
15 curriculum within a whole. This comes down to how
16 surface structure and deep structure are understood
17 in the human mind.

18 Q. Let's say the only thing quoted there was the
19 last -- was Number 8, "Having money brings out the
20 true nature of people."

21 A. Uh-huh.

22 Q. Would that be disclosure of a trade secret?

23 A. In itself, no.

24 Q. Okay, since you'd agree that's a fairly banal
25 idea?

Page 197

1 A. Well, I would -- just like every trade secret
2 is made of common letters, I would say most trade
3 secrets are made of banal ideas.

4 Q. Next paragraph under "Mystical Manipulation,"
5 you drew on the side lines, "The claim of divine
6 authority or spiritual advancement that allows the
7 leader to reinterpret events as he or she wishes, or
8 make prophecies or pronouncements at will, all for
9 the purpose of control" -- "at will, all for the
10 purpose of controlling group members."

11 A. Uh-huh.

12 Q. Were you indicating that that's a trade
13 secret of NXIVM's?

14 A. One of the important things of NXIVM is that
15 we are what you might call anti-mysticism. We are
16 critical thinkers. We use scientific model. We
17 take things down to assumptions. We go beyond
18 assumptions, breaking those down further.

19 To speak of these sort of things starts to go
20 towards those trade secrets. Again, in itself, no;
21 and that's why I asked you. Here is a -- a
22 situation where in the middle of this paragraph you
23 have Lifton being quoted.

24 Q. Uh-huh.

25 A. Now, the question is can I use quotes from

Page 198

1 other authors to reveal a trade secret? Well,
2 certainly I could quote sentences from many, many
3 authors, put those sentences together and tell you
4 anything about any trade secret. So that's why I
5 put a little sort of arrow. I didn't underline it
6 specifically, but this -- this starts to beg the
7 question, not only talking about certain subject
8 matters but utilizing other authors and quoting them
9 to bring concepts across. When you have improperly
10 -- when you improperly have trade secrets, that can
11 be used to not only reveal them but utilize them to
12 your own benefit, especially if you're a competitor.

13 Q. But standing alone, that sentence would not
14 reveal a trade secret of NXIVM's?

15 A. It may if it were the final piece in a
16 puzzle.

17 Q. Do these three articles taken together
18 provide the whole puzzle?

19 A. Hard to tell.

20 Q. Are you saying that 30 years of your life's
21 work might be captured by three articles?

22 A. Well, I have more than one trade secret. I
23 think we probably have hundreds of them. I think
24 that in -- it's hard to say how astute someone is in
25 reading the articles. I also think that the people

Page 199

1 that wrote the articles may well have acted together
2 as competitors. It's -- there are a lot of issues
3 here.

4 Q. You're saying -- and who are the people who
5 you understand wrote the articles?

6 A. I think Paul Martin wrote this article. Is
7 that correct?

8 Q. Right.

9 A. John Hochman wrote the other article, and
10 Paul Martin wrote two articles so two by Paul Martin
11 and one by John Hochman.

12 Q. What evidence do you have that they acted
13 together in writing the articles?

14 A. There's fingerprints.

15 Q. I'm not asking for detective work. What
16 evidence do you have?

17 A. Okay. We've had about 8,000 students come
18 through our course, and we've had many people from
19 the outside world look at it or whatever. There are
20 some mistakes that people can make looking at our
21 information, but then there are some errors that are
22 not just random. They're -- they're very
23 unprobablistic oversights.

24 In the John Hochman article he mentions
25 that we've had over 400,000 people through the

Page 200

1 organization. That is, especially for someone who
2 is studying the material, probably derived from the
3 website where it mentions in my past company there
4 were over 400,000 people. John Hochman made a
5 pretty strange error -- no one's made this error
6 before that we know of -- that somehow ESP has had
7 400,000 people through it. It struck me when I read
8 this article last night that Paul Martin also
9 mentions that we've had 400,000 people through ESP,
10 which means to me that there's a likelihood that
11 either John Hochman got this from Paul Martin, Paul
12 Martin got this from John Hochman or they both got
13 it from Rick Ross, but there is a -- if you give me
14 a few seconds, I can find where he mentions it. It
15 may not be in this article. It may be -- which is
16 the one I read last night?

17 Do you have the Exhibit Number of what I read
18 last night?

19 MR. CAMPION: 8.

20 A. 8.

21 Q. It should be up --

22 A. I'm in 6. Wait a few seconds. 8.

23 On Page 5 he starts to talk, "Keith Raniere
24 who has trained" -- or about halfway down, I put a
25 little dot for you, actually. "Keith Raniere who

<p style="text-align: right;">Page 201</p> <p>1 has trained over 400,000 followers who are now 2 rapidly accumulating most of the world's wealth." 3 We've had a number of people on blogs and 4 things like that, you know, say all sorts of things. 5 People don't make that error. That's a pretty what 6 you might call careless, unprobable error. Both 7 Hochman and Martin make the same error. 8 Q. So you find it improbable that it's a 9 coincidence? 10 A. I find that there is a likelihood it's not a 11 coincidence. 12 I think that with -- if you read, for 13 example, the Hochman settlement and some of the 14 other issues involved, make it a very reasonable 15 hypothesis, also, that it's not just a coincidence. 16 Q. When you say "the Hochman settlement," what 17 are you referring to? 18 A. There is a settlement that John Hochman has 19 with NXIVM. 20 Q. And what does he say in that settlement 21 document that leads you to believe -- 22 A. Well, there is -- 23 Q. -- that his errors were not honest? 24 A. It's not that his errors were not honest. 25 It's that it appears that he does not view his</p>	<p style="text-align: right;">Page 203</p> <p>1 results may well have been different. I -- I don't 2 have the settlement in front of me to quote, and I 3 only saw it briefly. 4 Q. Is it your understanding that the District 5 Court in that case dismissed NXIVM's claims against 6 Mr. Hochman? 7 A. It is my understanding that NXIVM had a 8 court case against Hochman. They were dismissed, so 9 Hochman had won that; and although it was dismissed 10 and Hochman had won, he still settled instead of 11 going to the Court of Appeals, and it seemed like he 12 made some -- for someone who has won a court case 13 made some pretty strong statements. 14 Q. Are you aware of any favorable articles that 15 have been published concerning NXIVM? 16 A. I don't -- I don't think so. I'm trying to 17 think. I don't think so. 18 Q. Getting back to Raniere-6, I'd like you to 19 take a look at the third from last page. 20 A. Raniere-6, third from last. Can you give me 21 a -- 22 Q. The Bates stamp number is P3658. 23 A. Oh, thank you. 24 THE WITNESS: I'm sorry. I said thank 25 you.</p>
<p style="text-align: right;">Page 202</p> <p>1 article as a scientific study. It appears that he 2 incorporated what he saw as Rick Ross' negative view 3 into his study. If that be the case, he has some 4 reason for believing Rick Ross has a negative view 5 through some sort of a communication. It's also 6 possible to assume that such a communication 7 occurred with Paul Martin. 8 Q. What is the Rick Ross -- 9 MR. SKOLNIK: Harold, one moment. 10 Mr. Raniere has just testified about a 11 settlement agreement that has not be produced in 12 this case; and I call for its production, please. 13 MR. McGUIRE: It's confidential. 14 MR. SKOLNIK: We'll take it under our 15 confidentiality order. 16 MR. McGUIRE: We'll see. 17 BY MR. KOFMAN: 18 Q. What in the Hochman settlement documents 19 indicates that he did not view his article as a 20 scientific method? 21 A. I -- I only -- I did not see the full thing. 22 There is an affidavit of sorts, testimony. I 23 believe he said that it was not meant as a 24 scientific study. Had he done the normal process 25 of a peer-reviewed scientific report that the</p>	<p style="text-align: right;">Page 204</p> <p>1 MR. SKOLNIK: Harold, where are you? 2 MR. KOFMAN: P3658 on Raniere-6. 3 A. Uh-huh. 4 Q. Do you see that the third from the bottom is 5 the -- is a quote from Work and Value. 6 A. Uh-huh. 7 Q. And the quote is, "This practice session will 8 give you a clear definition of work, an appreciation 9 of civilization and what it has given us, 10 humankind's purpose, and our own value in the 11 world." 12 Does that statement standing alone constitute 13 a trade secret of NXIVM? 14 A. Again, what I see on this page are a series 15 -- the whole page is quotes. As a matter of fact, 16 on the bottom, I probably forgot to mark one because 17 there is a quote here out of Tribute - 5th 18 Integration which not only gives the quote of the 19 module but the place in the curriculum. 20 Could you mark that, that that also -- 21 Q. If you'd mark it on that -- 22 A. Okay. 23 Q. -- the Exhibit copy. 24 THE WITNESS: And anyone else who has 25 copies.</p>

Page 205	Page 207
<p>1 Continuing...</p> <p>2 A. So each of these are quotes directly out of</p> <p>3 the trade secret protected module -- the manual. I</p> <p>4 do believe that the concepts behind this and the</p> <p>5 order of the concepts behind this certainly are</p> <p>6 trade secrets. I think that this potentially</p> <p>7 provides a window, certainly provides a small window</p> <p>8 into the manual. This page is all quotes from the</p> <p>9 manual. It may as well just have quoted the manual</p> <p>10 and asked me if each quote out of the manual reveals</p> <p>11 a trade secret.</p> <p>12 Q. Is there any trade -- do any of these quotes</p> <p>13 standing alone reveal a trade secret of NXIVM in it</p> <p>14 -- in its entirety?</p> <p>15 A. I don't know.</p> <p>16 Q. Are any trade secrets in their entirety</p> <p>17 revealed anywhere in this article?</p> <p>18 A. I don't know.</p> <p>19 Q. How about in the previous article, A Forensic</p> <p>20 Psych -- Raniere-5?</p> <p>21 A. I don't know.</p> <p>22 Q. Okay. Let's turn to Raniere Number 8, which</p> <p>23 is the document that you looked at last night.</p> <p>24 Are any trade secrets in their entirety</p> <p>25 revealed in this article?</p>	<p>1 A. Uh-huh.</p> <p>2 Q. What does that phrase mean?</p> <p>3 A. Well, I think that's something that is</p> <p>4 answered with more examination. You have to</p> <p>5 understand what a victim is and then what you mean</p> <p>6 in the ultimate sense, what is a victim.</p> <p>7 I mean, do you want a brief explanation?</p> <p>8 Q. Yes.</p> <p>9 A. I mean, I hate to go to extremes; but if you</p> <p>10 have two people being tortured, one person can have</p> <p>11 tremendous suffering and the other not. What the</p> <p>12 person ultimately has as their emotional state is</p> <p>13 personal and private to them and is independent of</p> <p>14 -- it is not, if you will, an objective state, as in</p> <p>15 humankind right now, we don't know of any objective</p> <p>16 external circumstances that can inspire a specific</p> <p>17 objective experience of emotion within you which</p> <p>18 means there is a certain voluntary capacity that you</p> <p>19 have for joy. So by saying there are no ultimate</p> <p>20 victims it says that ultimately, no matter how bad</p> <p>21 the circumstances are, you can have different</p> <p>22 amounts of joy that are independent to some degree</p> <p>23 of those circumstances and it holds a promise if --</p> <p>24 if you believe there are no ultimate victims, then</p> <p>25 you believe, I believe that humans can increase</p>
Page 206	Page 208
<p>1 A. You're -- you know, I'd like to answer your</p> <p>2 question other than "I don't know," but just like if</p> <p>3 you've ever seen a mystery movie or whatever, it is</p> <p>4 quite possible for people to deduce absolutely</p> <p>5 solutions and possibly trade secrets that I haven't</p> <p>6 deduced.</p> <p>7 Q. Are you aware of any trade secrets that are</p> <p>8 revealed -- strike that -- that are disclosed in</p> <p>9 their entirety in this article?</p> <p>10 MR. McGUIRE: Object to the form of the</p> <p>11 question.</p> <p>12 Q. Are you aware of any trade secrets that are</p> <p>13 disclosed in their entirety in this article?</p> <p>14 MR. McGUIRE: Same objection.</p> <p>15 A. Is that the same question? I'm not</p> <p>16 understanding the difference.</p> <p>17 Q. You can answer. He's just preserving an</p> <p>18 objection.</p> <p>19 A. Oh, I'm not sure.</p> <p>20 Q. Okay. Paragraph -- on this document, looking</p> <p>21 at P3677. It's about -- I think it's the fourth</p> <p>22 page.</p> <p>23 A. Yes.</p> <p>24 Q. It says there, "Number five, maintains that</p> <p>25 "There are no ultimate victims."</p>	<p>1 their capacity to have joy even in adverse</p> <p>2 situations.</p> <p>3 Q. Have you ever read an article that Stephanie</p> <p>4 Franco wrote -- strike that.</p> <p>5 Have you ever read anything that Stephanie</p> <p>6 Franco has written?</p> <p>7 A. Not in the entirety.</p> <p>8 Q. What have you read from Stephanie Franco?</p> <p>9 A. I saw an ad of hers for -- I think it was for</p> <p>10 her therapy services or her website. I saw her</p> <p>11 business card and I think -- I don't know if she --</p> <p>12 I'm not sure if I saw her business card. I -- I</p> <p>13 have a memory of that.</p> <p>14 MR. KOFMAN: Okay. Let's take a</p> <p>15 two-minute break, and then I'm going to go into</p> <p>16 another area.</p> <p>17 MR. CAMPION: Sure.</p> <p>18 THE VIDEOGRAPHER: We're going off the</p> <p>19 record at 10:40.</p> <p>20 (At this point, there was a short</p> <p>21 recess.)</p> <p>22 (Affidavit of Keith Raniere signed</p> <p>23 August 22, 2003, with attached Exhibits was received</p> <p>24 and marked Defendant's Exhibit Raniere-11 for</p> <p>25 Identification.)</p>

<p style="text-align: right;">Page 209</p> <p>1 THE VIDEOGRAPHER: This is the beginning 2 of Tape Number 2. The time is 10:56. We're on. 3 BY MR. KOFMAN: 4 Q. Okay. Mr. Ranieri, I'm going to show you a 5 document that's been marked as Ranieri-11 and ask if 6 you can take a look at that, please. 7 A. (Witness complies.) 8 Q. Do you recognize that document? 9 A. Yes. 10 Q. What is the document? 11 A. It appears to be my Affidavit, and I checked 12 and it has my signature on the back, so I assume it 13 is so. 14 Q. Okay. That was going to be my next question. 15 Did you draft the Affidavit? 16 A. I was certainly involved in the drafting. 17 Q. Did you review the Affidavit before you 18 signed it? 19 A. Yes. 20 Q. And did you determine that the statements 21 there were accurate? 22 A. Yes. 23 Q. Okay. Do you recall if you made any changes 24 to the Affidavit before signing it? 25 A. No. This was very -- this was quite long</p>	<p style="text-align: right;">Page 211</p> <p>1 passages may no longer desire to attend a course 2 wherein the material has been freely given to them." 3 Has any consumer ever told you that they 4 didn't take a NXIVM course because the information 5 was available for free on the internet? 6 A. That may have been so. I believe people in 7 the least have said, "I have read these articles. I 8 have no need to take your course." 9 But, you know, there have been so many 10 instances, thousands, I believe, of incident -- 11 instances like that, I don't know specifically. 12 Q. Well, let's talk about conversations that 13 you've had. 14 Has anyone said to you, I don't have any need 15 to take this course because of these articles? 16 A. No, not that I recall. 17 Q. Okay, and has anyone said to you -- strike 18 that. 19 Paragraph 5 of your Affidavit under the 20 heading "Mail and email." 21 A. Uh-huh. 22 Q. The first sentence, it says, "An information 23 pack has been sent to key people interfacing with 24 our organization containing these false facts and 25 our copyrighted material."</p>
<p style="text-align: right;">Page 210</p> <p>1 ago. 2 Q. You don't recall? 3 A. I don't recall. 4 Q. I'd like you to turn your attention to 5 Paragraph 4. 6 A. Uh-huh. 7 Q. The first sentence says, "Three of the 8 copyrighted materials currently posted on the 9 internet, 12-Point Mission Statement, Work and Value 10 and Face of the Universe, reveal the content and 11 methodologies that are critical to the heart of the 12 entire coursework." 13 Is it your contention that 12 point Mission 14 Statement, Work and Value and Face of the Universe 15 were ever posted on the internet in their entirety? 16 A. I don't -- I don't know if they were posted 17 in their entirety. Certainly key important 18 elements, and I don't think any portion of them was 19 supposed to be posted. 20 Q. Okay. Did it ever come to your attention 21 that the entire documents were posted on the 22 internet? 23 A. No, it has not. 24 Q. Okay. Getting down a little further in that 25 same paragraph, it says "Consumers that read the</p>	<p style="text-align: right;">Page 212</p> <p>1 Did you ever see a copy of the information 2 pack that you refer to in that paragraph? 3 A. I'm not sure. I have seen several 4 "information packs." 5 I do remember seeing a pack that was sent to 6 a person. I'm trying to think of when it was 'cause 7 when I wrote this statement I had -- I believe I had 8 a specific pack in mind, but I can't recall what it 9 is. 10 Q. Did you -- did you ever see that pack? 11 A. From reading this, I may -- well may have. 12 I've seen a number of information packs sent around, 13 so to speak, even recently at universities and 14 things like that. 15 Q. Do you know who sent the information pack 16 that you're referring to in Paragraph 5? 17 A. No, not off the top of my head. No, I don't. 18 Q. Do you know what it contained? 19 A. Probably copies of the articles; the Hochman 20 report, the Martin articles. That's my guess. 21 Q. Is that -- well, I'd ask you not to guess. 22 Did you ever -- do you know one way or the other 23 what was in that information pack? 24 A. No. 25 Q. Do you know who received it?</p>

Page 213	Page 215
<p>1 A. No, I don't remember at the time -- right 2 now. 3 Q. So it's the case that you don't remember much 4 -- recall much about that information pack? 5 A. Correct. 6 Q. At least as to that subject, I guess your 7 recall isn't total or even partial? 8 A. Well, there have been many information packs. 9 Q. Okay. Going a little further in that 10 sentence, "I have received messages and a 11 threatening e-mail addressed from a neighbor." 12 A. Uh-huh. 13 Q. When you say you've received messages, what 14 are you referring to? 15 A. Phone messages, written messages put on the 16 car, people driving up and threatening verbally; 17 things like that. 18 Q. Did you save any of the written messages? 19 A. I may -- there may be, but I'm not sure. 20 It's an ongoing thing. 21 Q. Did you turn any of those over to a lawyer? 22 A. I'm not sure. I don't know what went through 23 discovery. I tend not to keep -- if there are like 24 tapes or whatever, I tend not to keep them. Papers 25 that I have are either filed or if I write something</p>	<p>1 tape. 2 Q. Did your lawyers ever -- after you put this 3 in the Affidavit, did your lawyers ever ask to hear 4 the tape? 5 A. I don't know. I don't keep track -- I don't 6 keep possession of the tapes. 7 Q. Did your lawyers ever ask you to hear the 8 tape? 9 THE VIDEOGRAPHER: BlackBerries, turn 10 them off. 11 MR. KOFMAN: Are we off the record? 12 THE VIDEOGRAPHER: No, we're still on. 13 Continuing... 14 A. No. 15 Q. Okay. 16 A. I never mentioned it to them. 17 MR. KOFMAN: I'd like to make a request 18 for copies of any tapes, conversations. 19 Mark the record. 20 MR. CAMPION: You'll include that 21 in the letter you described yesterday? 22 MR. KOFMAN: Absolutely. 23 MR. CAMPION: Thank you. 24 (Request.) 25</p>
Page 214	Page 216
<p>1 or I'm involved with something else, often I don't 2 have the paper. 3 Q. Let's go back. When you say "tapes," what do 4 you mean, tapes that you don't keep? 5 A. In other words, if I go and I'm, for example, 6 giving a forum, I will go and give a forum. They 7 will tape what I say in the forum, what goes on in 8 the forum; but I don't have those tapes. 9 Q. How about tapes of any threatening messages 10 that you got? 11 A. I am not sure if such a tape exists. There 12 is a possibility that there is one. 13 Q. Did it ever exist -- okay. What makes you 14 believe that there may be a tape? 15 A. Because once when I was on a walk -- and I 16 walk -- I used to walk daily 8 to 12 miles, and what 17 I would do in the walks at times were have meetings 18 with people. People would tape those meetings. 19 There were a number of occasions where people drove 20 up in cars, threw things, screamed, cursed. Several 21 neighbors came down and said very hostile things. I 22 think there were -- there might have been at least 23 one occasion where such an interaction was taped; 24 but, as I said, it happens frequently; and I've 25 walked quite a bit, but I think there might be a</p>	<p>1 BY MR. KOFMAN: 2 Q. What were some of the things -- who were the 3 neighbors who yelled things at you? 4 A. I don't know their names and some of them 5 might -- people who appear not to live necessarily 6 where I walk waiting to run into me or whatever 7 so -- 8 Q. So there were people who were waiting for you 9 on your walk? 10 A. Uh-huh. 11 Q. Do you walk the same time every day? 12 A. Sometimes. I walk quite a bit, 8 to 12 -- I 13 don't now. In the past year, I have not walked that 14 much -- two years even -- but certainly before a 15 year or before two years I was walking 8 to 12 miles 16 a day. 17 Q. Anybody yell anything at you before August 18 2003? 19 A. No. 20 Q. What did they yell at you that -- that's 21 referenced in this paragraph? 22 A. Well, "You're a cult. You're killing people. 23 You should be killed." 24 Nancy had her house being built. It was -- 25 the picture of it was in the paper, and there was a</p>

<p style="text-align: right;">Page 217</p> <p>1 security system being installed so one person came 2 up and said and also said to other people, "Oh, they 3 better have a security system in there. You guys 4 are going to need it. I hope you get killed." 5 Q. Did they say that to you, or was that to 6 Nancy? 7 A. To me. 8 Q. Okay. 9 A. And I believe they might have said that to 10 Nancy. Although Nancy's not under deposition right 11 now, you may want to ask her. 12 Q. Did you report anything to the police? 13 A. We have tried at times to report things to 14 police or have actions done like the indictment of 15 Joe O'Hara. Most of the time we are ignored. 16 Q. Did you report any of these instances where 17 people have yelled threatening things to you to the 18 police? 19 A. No. It's -- I haven't had too many occasions 20 where there's a threat from a person -- a given 21 individual more than once or it's a chronic thing. 22 Q. And you didn't feel any of these threats were 23 credible? 24 A. I feel they're credible. I feel there's 25 nothing I can do about them.</p>	<p style="text-align: right;">Page 219</p> <p>1 Q. How did you hear about that? 2 A. There was a friend who had, I believe a 3 janitor that worked not only in the church but was 4 part of the parish. 5 And this is -- this is several levels of 6 information. 7 Q. The e-mails, how do you know they were from 8 neighbors? Did people give their names? 9 A. Sometimes. 10 Q. And the names you recognized as being 11 neighbors? 12 A. Sometimes. 13 Q. What did you do with the e-mails? 14 A. They're on some computer, some hard drive 15 that's probably long gone. When I did a search 16 through my e-mails, I think that would have been 17 something I would have turned over. I know that was 18 something that would have been relevant, and they're 19 not in my e-mails currently. 20 Q. Did you download any of these e-mails. 21 A. They automatically download if they're on the 22 Kunterre account. On the NXIVM account, they would 23 have been held on the server except we had a virus 24 attack the -- there was a time when a group was 25 attacking Scientology, and it was claimed because of</p>
<p style="text-align: right;">Page 218</p> <p>1 Q. So you didn't report any of those threats to 2 the police? 3 A. Correct. 4 Q. Okay. It says here that you received a 5 threatening e-mail addressed from a neighbor. 6 A. Yes. 7 Q. What did the e-mail say? 8 A. I don't remember offhand. There have 9 actually been a number of threatening e-mails from 10 neighbors. Normally they say things like, you know, 11 "You're a cult. You're evil. We know where you 12 live." They -- they make a lot of threats. "You 13 better watch where you go," things like that. 14 They're normally nothing direct like, "We're 15 going to kill you," although sometimes the verbal 16 threats are that way. 17 There was a church in our area that I had 18 also heard rumor made announcements to that effect. 19 Q. Made announcements to what effect? 20 A. That there was a cult in the area and that 21 all the parishioners should be careful and watch out 22 and -- a warning. 23 Q. What was the name of the church? 24 A. I don't remember. I know it was -- I could 25 probably find out if I questioned.</p>	<p style="text-align: right;">Page 220</p> <p>1 Rick Ross' site -- but I don't know if this is 2 true -- that we were viewed as a Scientology front 3 so they attacked our server, and we had to change 4 all of our hard drives and so a lot was lost. 5 Q. When was that? 6 A. I don't know. When was the date that there 7 was -- it was -- it made major news, and it shut 8 down our server. It was probably like a 9 year-and-a-half ago. 10 Q. Did you print out any of the e-mails that 11 were sent to -- any of the threatening e-mails? 12 A. Not for myself, but I believe some of them 13 were printed out. 14 Q. By who? 15 A. Well, if they're sent on the NXIVM server, 16 they're probab -- they were printed out by NXIVM. I 17 didn't print out any of the e-mails that came to my 18 personal e-mail. 19 Q. Did you consider them evidence in connection 20 with this case? 21 A. No. 22 Q. You've been in litigation before, haven't 23 you? 24 A. Yeah. 25 Q. Have you ever been instructed to preserve</p>

<p style="text-align: right;">Page 221</p> <p>1 documents?</p> <p>2 A. I think relevant documents. Something where</p> <p>3 someone says you better watch out or whatever, it</p> <p>4 seems to me like a silly document especially if you</p> <p>5 -- you present a hundred of those documents when you</p> <p>6 have things that are far more egregious and far more</p> <p>7 demonstrable.</p> <p>8 Q. It was relevant enough for you to put in this</p> <p>9 Affidavit, wasn't it?</p> <p>10 A. Yes.</p> <p>11 Q. But not relevant enough for you to save?</p> <p>12 A. Because there are many of them.</p> <p>13 Q. Did you save one of them?</p> <p>14 A. There might be. I'm -- I'm not positive. I</p> <p>15 know it is not on my computer. There may be a</p> <p>16 printout.</p> <p>17 MR. KOFMAN: I would make a request for</p> <p>18 one of those documents.</p> <p>19 (Request.)</p> <p>20 Q. 'Cause you understand that without actually</p> <p>21 seeing that document, it's just your word that you</p> <p>22 received these?</p> <p>23 A. Uh-huh.</p> <p>24 Q. You have to respond verbally.</p> <p>25 A. Oh, yes. I suspect because it is in this</p>	<p style="text-align: right;">Page 223</p> <p>1 A. Peter Fallon.</p> <p>2 Q. What was Mr. Fallon's rank in the group?</p> <p>3 A. I believe he was a four-stripe coach.</p> <p>4 Q. Okay. Is he a friend of yours?</p> <p>5 A. Yes, he was.</p> <p>6 Q. Did Mr. Fallon tell you why he was leaving?</p> <p>7 A. Because I believe he said his wife had phone</p> <p>8 conversations with Rick Ross. His wife became very</p> <p>9 negative on the organization, and he did not want</p> <p>10 that conflict in his life.</p> <p>11 Q. Did he indicate anything about the trade</p> <p>12 secrets being disclosed as a reason for him leaving?</p> <p>13 Strike that.</p> <p>14 Back up. Was that a conversation he had</p> <p>15 with you or with someone else that was reported to</p> <p>16 you?</p> <p>17 A. He said some of that to me, I believe, and I</p> <p>18 think he had numerous conversations with other</p> <p>19 people. I used to play volleyball with him.</p> <p>20 Q. Did he -- have you had any contact with him</p> <p>21 since 2003?</p> <p>22 A. Yes.</p> <p>23 Q. Did NXIVM ever make an effort to have him</p> <p>24 come back?</p> <p>25 A. Could you please define what you mean by</p>
<p style="text-align: right;">Page 222</p> <p>1 Affidavit there is probably a copy of it. I doubt I</p> <p>2 would want it -- I would mention it if there wasn't</p> <p>3 such a thing.</p> <p>4 MR. KOFMAN: It's been -- I'll put on</p> <p>5 the record that that's already -- that's been</p> <p>6 requested previously in this litigation as has the</p> <p>7 information pack and never been produced. I'll</p> <p>8 repeat the request now and follow up with a letter.</p> <p>9 (Request.)</p> <p>10 BY MR. KOFMAN:</p> <p>11 Q. You said at some point things have been</p> <p>12 thrown at you?</p> <p>13 A. Uh-huh.</p> <p>14 Q. You report those instances --</p> <p>15 You have to answer with a "yes" or a "no."</p> <p>16 A. Oh, yes.</p> <p>17 Q. You report those instances to the police?</p> <p>18 A. No.</p> <p>19 Q. Same paragraph, Paragraph 5, under "Loss of</p> <p>20 key people."</p> <p>21 A. Yes.</p> <p>22 Q. It says, "We have even lost a 4 year veteran</p> <p>23 Principal Coach."</p> <p>24 A. Yeah.</p> <p>25 Q. Who are you referring to?</p>	<p style="text-align: right;">Page 224</p> <p>1 effort to come back?</p> <p>2 Q. Did you ever ask him to come back to the</p> <p>3 program?</p> <p>4 A. You mean take other courses? Do you mean</p> <p>5 come to a volleyball game? Do you mean --</p> <p>6 Q. Come take courses.</p> <p>7 A. I don't -- I don't think so. It may be</p> <p>8 possible because at times he's wanted to be informed</p> <p>9 of things and at times not.</p> <p>10 Q. Okay. When he left, did he return any course</p> <p>11 materials to NXIVM?</p> <p>12 A. I think he did. I'm not sure.</p> <p>13 Q. Do you know one way or the other?</p> <p>14 A. I don't know one way or the other.</p> <p>15 Q. Did you ask him to return any materials?</p> <p>16 A. I don't know. I -- do you consider him --</p> <p>17 you know, he is not an active coach; and we lost him</p> <p>18 in that way in that function. He is someone who is</p> <p>19 still friendly to us, and I'm not sure what his</p> <p>20 level of involvement is with respect to interfacing</p> <p>21 with the organization.</p> <p>22 Q. Did Mr. Fallon indicate -- strike that.</p> <p>23 So Mr. Fallon indicated the reason he was</p> <p>24 leaving was because of his wife and negative things</p> <p>25 she had heard about NXIVM?</p>

<p style="text-align: right;">Page 225</p> <p>1 A. And the negative press, I believe.</p> <p>2 Q. Okay. Next in this "Loss of key people" it</p> <p>3 says, "Goldie Hawn cancelled her engagement with us</p> <p>4 next week because of the false press."</p> <p>5 A. Yes.</p> <p>6 Q. Did you ever speak to Ms. Hawn?</p> <p>7 A. No.</p> <p>8 Q. Do you know who in the organization was</p> <p>9 dealing with her?</p> <p>10 A. I'm trying to think who was dealing with her</p> <p>11 agent. I believe it was Barbara Bouchey.</p> <p>12 Q. Did NXIVM suffer any monetary loss as a</p> <p>13 result of Goldie Hawn not coming to Vanguard Week?</p> <p>14 A. Yes.</p> <p>15 Q. How so?</p> <p>16 A. We had paid Goldie Hawn's agent \$50,000,</p> <p>17 and Goldie Hawn's agent did not return the \$50,000</p> <p>18 for something like two years. Goldie Hawn was very</p> <p>19 upset by this, did not think it was appropriate. It</p> <p>20 might have been an oversight.</p> <p>21 If you call not having \$50,000 for two years</p> <p>22 some sort of a damage, then yes. There's also the</p> <p>23 damage of this being publicized because we keep most</p> <p>24 of our people except people who give us permission</p> <p>25 to say they're involved with the organization</p>	<p style="text-align: right;">Page 227</p> <p>1 they might say one in '81 or '82.</p> <p>2 Q. Okay. And those -- were those all Bachelor</p> <p>3 of Science degrees?</p> <p>4 A. Yes.</p> <p>5 Q. Do you hold any advance -- any Master's</p> <p>6 degrees?</p> <p>7 A. No.</p> <p>8 Q. Have you ever taken any classes for a</p> <p>9 Master's degree?</p> <p>10 A. Yes.</p> <p>11 Q. When?</p> <p>12 A. Starting when I first went to college when I</p> <p>13 was 17.</p> <p>14 Q. Did you decide not to pursue a Master's</p> <p>15 degree?</p> <p>16 A. No. I -- I haven't made a decision yet.</p> <p>17 Q. So you may still go back and get your</p> <p>18 Master's?</p> <p>19 A. Sometime.</p> <p>20 Q. Okay. And what were you taking class --</p> <p>21 Master's classes in?</p> <p>22 A. Well, they were actually -- they're Ph.D.</p> <p>23 classes.</p> <p>24 Q. Okay.</p> <p>25 A. In mathematics and physics.</p>
<p style="text-align: right;">Page 226</p> <p>1 secret. So when it came out that Goldie Hawn was</p> <p>2 coming, which we would never advertise, people</p> <p>3 became fearful that they might be known or their</p> <p>4 identities might be revealed 'cause we hold those</p> <p>5 as secret, so we did have a good degree of damage</p> <p>6 from that.</p> <p>7 Q. Looking at Paragraph 5 where it says a</p> <p>8 billionaire network founder left, is that referring</p> <p>9 to Sheila Johnson?</p> <p>10 A. Probably.</p> <p>11 Q. Did you have a conversation with Ms. Johnson</p> <p>12 about her leaving?</p> <p>13 A. No.</p> <p>14 Q. Did she ever return to take NXIVM classes</p> <p>15 after this?</p> <p>16 A. I'm not sure.</p> <p>17 Q. Okay. Looking at Paragraph 8 of your</p> <p>18 Affidavit, what year did you graduate from RPI?</p> <p>19 A. I think officially it was '82.</p> <p>20 Q. Why do you say "officially"?</p> <p>21 A. Because I have three different degrees and</p> <p>22 they -- I think they consider the first degree --</p> <p>23 degree accruing in 1980. It's -- when I look and</p> <p>24 they -- like on yearbooks or alumni sites, they say</p> <p>25 that like I got a degree in '80, and then I think</p>	<p style="text-align: right;">Page 228</p> <p>1 Q. Okay. Paragraph 11 you have -- the second</p> <p>2 sentence -- third sentence says, "To my knowledge I</p> <p>3 was the first 17 year old to take advanced 600 level</p> <p>4 mathematics courses in RPI's then 153 year history."</p> <p>5 A. Yes.</p> <p>6 Q. What's the basis for that knowledge?</p> <p>7 A. Well, RPI has not only a registrar's office</p> <p>8 but has -- at the time, they had an organization</p> <p>9 called IPAC which was a student-run information</p> <p>10 service that would do research on odd questions.</p> <p>11 So when I was going through depositions with my</p> <p>12 other company with the State Corporation Commission</p> <p>13 and things like that, I needed to verify all of</p> <p>14 these different things. I needed to verify that I</p> <p>15 was in the Guinness Book of World Records. I needed</p> <p>16 to verify that I had three degrees from RPI. I</p> <p>17 needed to verify each of these claims. And we tried</p> <p>18 with respect to the claim of were there any other</p> <p>19 triple majors; and at that point, RPI had come back</p> <p>20 with no, that I was the first and that this, in</p> <p>21 fact, was true.</p> <p>22 Q. Have you ever learned anything different?</p> <p>23 A. No.</p> <p>24 Q. Okay. How long did you work at MIT Bates</p> <p>25 Laboratory?</p>

Page 229	Page 231
<p>1 A. On and off for maybe a year.</p> <p>2 Q. What was your title there?</p> <p>3 A. I was a research -- I was a research</p> <p>4 physicist and a systems programmer.</p> <p>5 Q. Why did you leave MIT?</p> <p>6 A. I never went to MIT.</p> <p>7 Q. Why did you leave MIT Bates Laboratory?</p> <p>8 A. Oh, because the physics group that I was</p> <p>9 working with discontinued their project there. We</p> <p>10 were renting time on the accelerator to measure</p> <p>11 particle instances.</p> <p>12 Q. Were you employed by MIT --</p> <p>13 A. No.</p> <p>14 Q. -- by the Bates Laboratory, or were you a</p> <p>15 contractor?</p> <p>16 A. I was through RPI, and I was on a work-study</p> <p>17 program. I'm not sure how that was funded, although</p> <p>18 I do know that it was a joint project between MIT</p> <p>19 and RPI so the funding for my student item or</p> <p>20 whatever it is may have come from there. I don't</p> <p>21 know.</p> <p>22 Q. In Paragraph 13 of your Affidavit you refer</p> <p>23 to something called "The Life Learning Institute."</p> <p>24 A. Yeah.</p> <p>25 Q. Was that ever founded?</p>	<p>1 There was Matol International. There was a</p> <p>2 company called Nashika, I believe.</p> <p>3 Q. Did you have a supervisor or someone you</p> <p>4 reported to in that -- as a contractor?</p> <p>5 A. No. Most of these things are very loose</p> <p>6 structures.</p> <p>7 Q. Looking at Paragraph 30 (sic), you refer to</p> <p>8 the founding of Consumers' Buyline. Who were the</p> <p>9 four friends with whom you started Consumers'</p> <p>10 Buyline?</p> <p>11 MR. McGUIRE: What Paragraph?</p> <p>12 MR. KOFMAN: Paragraph 30.</p> <p>13 MR. McGUIRE: Thank you.</p> <p>14 Continuing...</p> <p>15 A. Kristin Keeffe was one of them, a gentleman</p> <p>16 named Dave Bush was another, a woman named Pam</p> <p>17 Cafritz was another and a woman named Linda Smith.</p> <p>18 Q. Okay. Are all of those individuals in --</p> <p>19 were all of those individuals involved in the</p> <p>20 founding of Executive Success Programs?</p> <p>21 A. No.</p> <p>22 Q. Who was not?</p> <p>23 A. Dave Bush was not, Linda Smith was not --</p> <p>24 when you say "involved in the founding" --</p> <p>25 Q. Were all of those individuals -- did all of</p>
Page 230	Page 232
<p>1 A. How do you define "founded"?</p> <p>2 Q. Did you ever -- did the Life ever -- Learning</p> <p>3 Institute ever become operational?</p> <p>4 A. No.</p> <p>5 Q. Okay. What did you do for a living between</p> <p>6 1984 and 1987?</p> <p>7 A. I worked for the State of New York.</p> <p>8 Q. In what capacity?</p> <p>9 A. Well, I started out in the Department of</p> <p>10 Labor as a computer programmer analyst; and then I</p> <p>11 moved over to the Division of Parole as their head</p> <p>12 of microcomputer services, which is the same item</p> <p>13 level but different responsibilities.</p> <p>14 Q. In Paragraph 18 of your Affidavit it says you</p> <p>15 became an independent contractor for marketing and</p> <p>16 sales organizations. What were the names of those</p> <p>17 organizations?</p> <p>18 A. Well, I think the one -- I mean, there were a</p> <p>19 number of them.</p> <p>20 Do you want me to go through the ones that I</p> <p>21 remember?</p> <p>22 Q. Why don't you? Yeah.</p> <p>23 A. There was Prepaid Legal, there was TVC</p> <p>24 Marketing. Let me see. Which thing was it saying</p> <p>25 in here?</p>	<p>1 those individuals take classes with NXIVM?</p> <p>2 A. No, only two of them.</p> <p>3 Q. Kristin Keeffe and Ms. Cafritz?</p> <p>4 A. Oh, I'm sorry. Linda Smith has also taken</p> <p>5 classes, so that's three.</p> <p>6 Q. Okay. Paragraph 28, I'm just going back a</p> <p>7 little bit, you refer to a paper that you wrote that</p> <p>8 "was circulated throughout my industry."</p> <p>9 A. Uh-huh.</p> <p>10 Q. What was the name of the paper?</p> <p>11 A. It didn't have a name. People at times</p> <p>12 referred to it as the White Paper.</p> <p>13 Q. Was it published anywhere?</p> <p>14 A. No.</p> <p>15 Q. How was it circulated?</p> <p>16 A. People photocopied it.</p> <p>17 Q. Did you distribute it?</p> <p>18 A. No.</p> <p>19 Q. Did you write it? What did you write -- what</p> <p>20 was the purpose of you writing the paper?</p> <p>21 A. I wrote the paper as an essay to give to</p> <p>22 certain reps so they would understand the way it</p> <p>23 worked. And they, unfortunately, took the liberty</p> <p>24 of copying it; and it was circulated, and it had an</p> <p>25 impact.</p>

<p style="text-align: right;">Page 233</p> <p>1 Q. Who were the people that you claim in 2 Paragraph 28 threatened you? 3 THE WITNESS: This is a person who -- 4 MR. CAMPION: Answer the question. 5 A. He was the person at the time who was head of 6 Main Street Alliance. He was a major distributor 7 with a company called Fund America at one point. 8 Howard Ruff his name is. 9 Q. Okay. What did he say to you? 10 A. Well, he gave -- he actually gave me two 11 separate phone calls. The first phone call was sort 12 of nice before the paper and before our growth. 13 When he received the paper he said, "I don't know 14 who you think you are. This industry sticks 15 together. You need to watch your step. Your 16 company is growing now, but you'll be history." 17 He was right. 18 Q. Okay. I see you've attached to your or you 19 attach to your Affidavit various Exhibits, and I'm 20 going to look at those. 21 Actually, before we do that, let's get back 22 to Paragraph 43. How many months must one be 23 observed in order to be a facilitator? 24 A. I don't know. 25 Q. Is it more than two?</p>	<p style="text-align: right;">Page 235</p> <p>1 Q. Does NXIVM have documents that explain all of 2 these gradations? 3 A. I don't know if they have documents that 4 explain all of the gradations. Some of them we have 5 no one up at those ranks yet. 6 Q. And you said -- I think you said you had the 7 highest sash rank. It was double white, was that -- 8 A. Right. 9 Q. What sash rank is Ms. Salzman? 10 A. She is what's called a prefect. All the 11 ranks, which the ranks I hadn't gotten to above what 12 are called the black sash or the mentor sash, are 13 more academic ranks. They are -- you go from mentor 14 to a senior mentor to a chancellor which oversees 15 schools to a -- what's called a prime and then 16 ultimately to a prefect, which oversees all of the 17 schools, and then you have senior prefects and 18 things like that which we don't have yet. 19 Q. So it's somewhat similar to the robes that ac 20 -- universities? 21 A. Academic. 22 Q. -- academic facilities would use? 23 A. The whole program was modeled after 24 academics. 25 Q. Looking at Appendix D or Exhibit D, what I</p>
<p style="text-align: right;">Page 234</p> <p>1 A. It depends on the person. Normally, yes. 2 There are some people that show a special aptitude 3 or are motivated. 4 Q. Paragraph 44 on Page 14 you say that Mr. -- 5 A. Paragraph 44 appears on Page 12 on my copy. 6 Q. And it continues through Page 14 -- 7 A. Oh. 8 Q. -- so I'm looking at a portion that's on 9 Page 14. 10 A. Oh, okay. 11 Q. You say that Mr. Martin incorrectly states 12 that orange sash is the highest rank. 13 A. Correct. 14 Q. What ranks -- what sashes are higher in rank 15 than orange sash? 16 A. There is a green sash, there is a blue sash, 17 there is a purple sash, there is a brown plain sash, 18 then there's a brown sash that has a black trim. 19 Q. Uh-huh. 20 A. And then there is a brown sash that has like 21 a checkerboard, and then there is a brown sash that 22 has a brown top with black tails. Then there's a 23 black sash. 24 Do you want me to go -- there are probably -- 25 there are more, a lot more.</p>	<p style="text-align: right;">Page 236</p> <p>1 want you to look at, the very last sentence on 2 Page 21. 3 A. Uh-huh. 4 Q. It says, "We have spent hundreds of thousands 5 of dollars to protect themselves and this very 6 valuable technology that is the culmination of 7 thirty years of my life." 8 How did you determine that you had spent 9 hundreds of thousands of dollars to protect trade -- 10 trade secrets? 11 A. Well, I mean, at this point, we've spent tens 12 of millions. 13 Q. Would that include litigation costs? 14 A. I think, yeah, but I believe in this 15 particular case I had heard some things about the 16 losses. I certainly knew directly of some of the 17 losses. I know some of the things that had to be 18 done to try to prevent those losses. I suspect when 19 I said we spent hundreds of thousands, I would say 20 that if it were -- if I knew pretty certainly it was 21 between a million and 2 million, to underestimate 22 it. I don't remember the exact way I derived that 23 conclusion. I am sure at the date this Affidavit 24 was signed that it is pretty simple to show it's 25 hundreds of thousands or more.</p>

Page 237	Page 239
<p>1 Q. Did someone ever itemize for you what was 2 spent to protect the trade secrets? 3 A. No. I think I itemized it myself. 4 Q. Is there any documents that exist that 5 itemize what was done to protect the trade secrets? 6 A. I don't know. 7 Q. How was the hun -- how were the hundreds of 8 thousands of dollars spent, on what? 9 A. I'm not exactly sure. Let's see. I am 10 reading the paragraph for a second -- 11 Q. Sure. 12 A. -- to see exactly what I'm referring to. 13 Okay. This talks about the trademarks and 14 the copyrights on our materials and to protect them. 15 I think I knew from Arlen, for example, that there 16 were costs even involved with his protecting, 17 trademarking the stuff, getting it registered or 18 whatever that process is, doing the litigation. 19 Q. What litigation? 20 A. Well, there's the -- way back when there 21 was a copyright action that was filed separately, I 22 believe, from the first action. I think it was a 23 second action. 24 Q. So some of that includes money that was spent 25 in this litigation?</p>	<p>1 posted on the internet and August 22, 2003? That's 2 what you were referring to? 3 A. Well, is this the date that this was filed, 4 that I signed this Affidavit? 5 Q. You can take a look I think on Page 15 to 6 refresh your recollection. 7 A. Well, whatever date this Affidavit was 8 signed. This says March 9, 2006, is that -- I'm 9 sorry. That's not when it was signed. 10 22nd day of August, yes, then that would be 11 true. 12 Q. Okay. 13 A. Are we done with this Exhibit? 14 Q. We are. 15 (A discussion was held off the record.) 16 MR. KOFMAN: Let's mark this as 17 Ranieri-12. 18 (First Principles' Third Amended 19 Responses to Defendant Stephanie Franco's Second Set 20 of Interrogatories to First Principles was received 21 and marked Defendant's Exhibit Ranieri-12 for 22 Identification.) 23 BY MR. KOFMAN: 24 Q. Ranieri-12 is titled First Principles' Third 25 Amended Response to Defendant Stephanie Franco's</p>
Page 238	Page 240
<p>1 A. Let me read this to be sure that's what I was 2 referring to. 3 Q. Okay. 4 A. I think that this could easily be referring 5 to that because it says, "We have spent hundreds of 6 thousands of dollars to protect ourselves and this 7 very valuable technology that is a culmination of 8 thirty years of my life." 9 I think there had to be different -- we had 10 to hire consultants, people like that in order to 11 figure out how to protect from further attacks, 12 from further hemorrhaging from the release of this 13 copywritten (sic) information. I mean, 55 percent 14 of the Mission Statement was put out on the 15 internet. And that's the only thing that I wrote 16 so that's -- that's a difficult thing. That's not 17 good. 18 Q. So were those all expenses -- those hundreds 19 of thousands, was that all expenses that you 20 incurred between the time this was posted on the 21 internet and August 22, 2003? 22 A. If this was when the document was signed, 23 yes. 24 Q. So the hundreds of thousands of dollars was 25 what was spent between the time that information was</p>	<p>1 Second Set of Interrogatories to First Principles, 2 and I know that's a mouthful. 3 A. Okay. 4 Q. Have you seen this document before? 5 A. I'm not sure. 6 Q. I'd like you to turn your attention to Page 7 21. 8 A. (Witness complies.) 9 Uh-huh. 10 Q. Do you see there it contains references to 11 judgments that had been entered against you? 12 A. Under "Response" second paragraph it says, 13 "Without" -- can I read this? 14 Q. Sure, of course. 15 A. I don't know if I've ever read this. 16 Okay. 17 Q. Does this refer to judgments that had been 18 entered against you personally? 19 A. I don't know. I believe so. 20 Q. What was -- was a judgment entered in favor 21 of Knox Woods Homeowners' Association against you? 22 A. I don't know about that. 23 Q. Do you recall an -- do you know who Knox 24 Woods Homeowners' Association is? 25 A. Yes.</p>

<p style="text-align: right;">Page 241</p> <p>1 Q. Who are they?</p> <p>2 A. They're the condo association that they sort</p> <p>3 of do lawns. They're involved -- the sort of things</p> <p>4 that you get charges as if your dog goes and does</p> <p>5 bad business on someone else's lawn, there's a \$50</p> <p>6 fine, things like that.</p> <p>7 Q. Okay. Did -- do you have dues that you have</p> <p>8 to pay to them?</p> <p>9 A. Yes, there are dues.</p> <p>10 Q. Was the --</p> <p>11 A. I don't know what they are.</p> <p>12 Q. Was the judgment entered against you related</p> <p>13 to unpaid dues?</p> <p>14 A. I have no idea. I don't pay the dues.</p> <p>15 Q. Why not?</p> <p>16 A. Because it's not my responsibility. I own</p> <p>17 half of the house that I live in. I am on the title</p> <p>18 half. I am not on the mortgage half. I paid money</p> <p>19 up front to put into the house as down payment and</p> <p>20 upgrades and options so I'm not financially between</p> <p>21 Karen and myself responsible for the homeowners'</p> <p>22 dues.</p> <p>23 Q. That's Karen Unterreiner?</p> <p>24 A. Unterreiner, yes. I believe that's tied into</p> <p>25 the mortgage, but I'm not sure.</p>	<p style="text-align: right;">Page 243</p> <p>1 you know, I think it started out like 20 or \$30,000</p> <p>2 because it was probably a few hundred thousand</p> <p>3 dollars of brochures, and I think over the years</p> <p>4 it's like a hundred thousand or something,</p> <p>5 something I can't pay.</p> <p>6 Q. Has that been paid?</p> <p>7 A. As far as I know, it hasn't. I don't</p> <p>8 necessarily agree with the assessment. It was</p> <p>9 fought in audit and because we didn't have money</p> <p>10 and because the company was going under, we couldn't</p> <p>11 defend ourselves, and so the default was for it to</p> <p>12 roll over; but it is as it is.</p> <p>13 Q. It is presently a debt of yours?</p> <p>14 A. Yes.</p> <p>15 Q. Do you consider it ethical not to have paid</p> <p>16 the debt?</p> <p>17 A. Yes.</p> <p>18 Q. Why?</p> <p>19 A. Because without going into a lot of the</p> <p>20 details of the debt, one, I'm not sure that the debt</p> <p>21 was owed at all in the first place by Consumers'</p> <p>22 Buyline. It appeared not. Two, we were not because</p> <p>23 of lack of funds and certain incompetencies I think</p> <p>24 on both sides, both the tax department and our side,</p> <p>25 did not get to go through due process with it. And</p>
<p style="text-align: right;">Page 242</p> <p>1 Q. Okay. Do you -- do you know what the amount</p> <p>2 of the judgment was?</p> <p>3 A. No. I don't know of the judgment.</p> <p>4 Q. The first time you're hearing about the</p> <p>5 judgment was today?</p> <p>6 A. I think so.</p> <p>7 Q. Okay. How about a judgment entered by New</p> <p>8 York State Tax Department dated May 11, 1998?</p> <p>9 A. Yes.</p> <p>10 Q. Are you familiar with that?</p> <p>11 A. Yes.</p> <p>12 Q. What does that relate to?</p> <p>13 A. When I was CEO of Consumers' Buyline -- and I</p> <p>14 don't know how much you know about New York State or</p> <p>15 how the law works -- we had a printer, apparently,</p> <p>16 and this was very remote from me within the</p> <p>17 organization. We had purchased some materials that</p> <p>18 were printed in Connecticut, and there was some sort</p> <p>19 of use tax due that was not filed or some such thing</p> <p>20 on those printed things. It is my understanding</p> <p>21 that that generated a tax liability, and when a</p> <p>22 corporation is moribund it rolls over to the</p> <p>23 principals so there's a tax liability in my name.</p> <p>24 Q. Okay. Did -- what was the amount of that?</p> <p>25 A. I think it was very high. I think with --</p>	<p style="text-align: right;">Page 244</p> <p>1 then it was rolled over unexpectedly. I was not</p> <p>2 aware that that would even happen. At this point</p> <p>3 in time, ethical or not, I would not have the money</p> <p>4 to pay that debt.</p> <p>5 Q. How about -- the third thing I think</p> <p>6 identified is L.R. Credit Fine LLC, and it's a</p> <p>7 judgment dated November 14, 2005.</p> <p>8 Do you know what that relates to?</p> <p>9 A. No.</p> <p>10 Q. You never heard of L.R. Credit Fine LLC?</p> <p>11 A. No. I can hypothesize.</p> <p>12 Q. What's your understanding?</p> <p>13 A. There is a woman, Toni Natalie, who what I</p> <p>14 believe took a credit card, actually signed</p> <p>15 something in my name and ran up charges. She -- we</p> <p>16 went through bankruptcy litigation with her to try</p> <p>17 to reveal that this had happened, but that debt was</p> <p>18 transferred I think through a number of different</p> <p>19 organizations that shuffled the paper. At one</p> <p>20 point, I had objected to it; but I think that this</p> <p>21 is probably a result of that, although I'm not sure.</p> <p>22 Q. Have you made any -- were you aware of this</p> <p>23 judgment before today?</p> <p>24 A. No.</p> <p>25 Q. Did you ever report to a credit card company</p>

Page 245	Page 247
<p>1 that Toni Natalie had used your credit card without 2 permission? 3 A. Yes. 4 Q. What was their response? 5 A. Okay. They wanted me to send them 6 documentation. I sent them documentation, heard 7 nothing from them for a long time and then heard 8 from another company that had purchased, whatever, 9 the paperwork; and I don't know how it went from 10 there. Just it's an ongoing thing. 11 Q. Okay. That's all for that document. 12 MR. KOFMAN: Mark this as Raniere -- is 13 it 12 or 13? 14 THE REPORTER: 13. 15 MR. KOFMAN: 13. 16 (12 Point Mission Statement Bates 17 stamped SF 00329 was received and marked Defendant's 18 Exhibit Raniere-13 for Identification.) 19 BY MR. KOFMAN: 20 Q. Raniere-13 is a document entitled "12 Point 21 Mission Statement By Keith Raniere." 22 Do you recognize this document? 23 A. Yes. 24 Q. Is that the Mission Statement that you wrote? 25 A. This appears to be the Mission Statement I</p>	<p>1 the world -- if the monies and the efforts of the 2 people were respected in the world and that was 3 controlled ethically, the world would be a better 4 place. 5 Q. What's the phrase, "within my success plan" 6 mean? 7 A. That means that whatever a person sees in 8 life -- you're not saying to the person, "Look, you 9 must earn a lot of money and you must control the 10 money." 11 It is within what you think, you envision 12 yourself in the world, what your -- your vision of 13 success for yourself is. You will hold the efforts 14 that people back money with as something sacred, and 15 that money will not be just disregarded. 16 Q. Okay. Do you have a success plan? 17 A. Yes. 18 Q. What is your success plan? 19 A. To try to inspire joy in the world, and it 20 changes. Right now, to try to inspire a nonviolent 21 conflict resolution in Mexico. I devote quite a bit 22 of thought and effort to that. 23 I've worked on a program called Human 24 Essentials which are practices that all the 25 different people, classes within Mexico can do that</p>
Page 246	Page 248
<p>1 wrote, yes. 2 Q. Looking at the next-to-last Mission 3 Statement, the sentence, "I pledge to ethically 4 control as much of the money, wealth and resources 5 of the world as possible within my success plan" -- 6 A. Uh-huh. 7 Q. -- can you explain to me what that means? 8 THE WITNESS: Well, this is under 9 confidence; yes? 10 MR. CAMPION: It is. 11 A. Okay. If you think of the value of money -- 12 if you think of the value of money, and money is 13 made valuable by people's efforts, the reason why 14 money can work is if people are willing to work for 15 it. And a metaphor that is used is if there was a 16 slave auction downtown and slaves were for sale, you 17 know, would you go and buy them? And a lot of 18 people say, "Oh, I'd have nothing to do with it, 19 nothing to do with it." But wouldn't you buy them 20 to set them free? 21 Now, if there's a certain amount of money in 22 the world and there's people's efforts that are used 23 to back it, if that money is controlled by people 24 who are not ethical, those efforts are being 25 harnessed in a not ethical way. I believe that if</p>	<p>1 will inspire nonviolent conflict resolution. And I 2 can go into more detail if you want. 3 Q. Is it fair to say your success plan doesn't 4 include getting enough money to pay the State of New 5 York tax obligation? 6 MR. CAMPION: I object to the form of 7 that question. 8 Counsel, you know better than that. 9 MR. McGUIRE: Join. 10 MR. KOFMAN: I'll withdraw the question. 11 BY MR. KOFMAN: 12 Q. Looking at the next Mission Statement -- and, 13 by the way, what is -- can you explain to me just 14 generally what the Mission Statement is? 15 A. Originally the Mission Statement was an 16 expression. It's more of a poem in some ways. 17 it's -- I wrote it pretty quickly, and it contains 18 numerous errors. We've actually had not only 19 numerous suggestions but a possibility of changing 20 different things, but it's seen in itself as a -- 21 more of a poetic expression. It expresses many of 22 the ideas in ESP, but it also expresses some of the 23 legal con -- the legal concepts of confidentiality 24 that are important, and we want to be sure that 25 people not only in signing agreements but in a</p>

<p style="text-align: right;">Page 249</p> <p>1 written sense under -- in a verbal sense understand 2 that this information is confidential and to be 3 guarded. It was our intent when we began ESP to 4 find every way possible to guard the information as 5 confidential, as our private property, and it was 6 incorporated in this. 7 Q. Would you agree that these are fundamental 8 precepts of the organization? 9 A. I'm not sure what you mean by "fundamental 10 precepts." 11 Q. Okay. Am I correct that the 12 Point Mission 12 Statement is recited before each class at NXIVM? 13 A. Yes, unless they're in a group of classes. 14 Then it's recited once. 15 Q. Okay. Looking at the last -- 16 A. I need to make an amendment to that. 17 Q. Sure. 18 A. In certain programs. There are certain 19 programs where it is not recited. 20 Q. Which programs is it recited in? 21 A. Ethos, the Intensive; but not Origins. You 22 know, I don't know if it's recited in the Ethicist 23 training. It won't be recited in Human Essentials. 24 Q. Looking at the last paragraph of the Mission 25 Statement, the last sentence says, "I pledge to</p>	<p style="text-align: right;">Page 251</p> <p>1 the term "enroll," it can include a passive act? 2 A. Yes, absolutely. 3 THE VIDEOGRAPHER: Excuse me. We have 4 to change tapes. 5 MR. KOFMAN: Okay. 6 (A discussion was held off the record.) 7 THE VIDEOGRAPHER: We're back on the 8 record. The time is 11:54. 9 MR. KOFMAN: Please mark this as 10 Raniere-14. 11 (Confidential five-page memorandum to 12 Keith Raniere, Nancy Salzman from Joseph J. O'Hara 13 dated March 1, 2004, was received and marked 14 Defendant's Exhibit Raniere-14 for Identification.) 15 BY MR. KOFMAN: 16 Q. I'm going to show you a document that we've 17 marked as Raniere-14. It is a four-page (sic) 18 document that was produced to us in discovery, and 19 it claims to be a Memorandum from Joseph O -- 20 J. O'Hara to Keith Raniere and Nancy Salzman. 21 A. Yes. 22 Q. Have you seen that document before? 23 A. I'm not exactly sure. 24 Q. Does that mean you don't recall? 25 A. There are two comments. Without reading this</p>
<p style="text-align: right;">Page 250</p> <p>1 share and enroll people in ESP and its mission for 2 myself and to help make the world a better place to 3 live." 4 A. Uh-huh. 5 Q. Can someone fulfill the mission of NXIVM 6 without seeking to enroll other people in the 7 course? 8 A. Actually, yes -- 9 Q. Where does -- 10 A. But -- 11 Q. Does it say that anywhere here? 12 A. But it depends on how you define 13 "enrollment." 14 The word enrollment can be to go out and 15 actively try to recruit, but the enrollment in the 16 way that we use it happens naturally when you 17 believe in something. If I go out and I -- I'm a 18 vegetarian, for example. I enroll people in 19 vegetarianism. Whether they become a vegetarian or 20 not -- whether my attorneys become a vegetarian or 21 not, they see me genuinely engaged in that; and 22 either I stand as an example for someone to do it or 23 not to do it or not enough of an example to change 24 where they are, but that's the nature of enrollment. 25 Q. So in this sense, the term -- when you use</p>	<p style="text-align: right;">Page 252</p> <p>1 document, was this produced by Joe O'Hara, or was 2 this produced by us? 3 Q. It's got a Bates stamp number indicating that 4 it was pro -- strike that. 5 Would that make a difference as to whether or 6 not you've seen it before? 7 A. That would make a difference as to whether or 8 not I would trust that the document has integrity. 9 Q. Can you explain that? 10 A. I believe that Joe O'Hara is not honest. 11 Q. Okay. Looking at that document, can you tell 12 whether you've seen it before, without knowing when 13 it was produced and whether -- who produced it? 14 A. It's hard to tell and it's quite a long 15 document so... 16 Q. Anything in that document ring a bell that 17 you've seen this before? 18 You can take your time and read it. 19 A. Yes. I've seen something I believe like this 20 before. 21 Q. Would that have been back in 2004? 22 A. It sounds like a possible date. I'm not 23 sure. Joe O'Hara had taken a VIP training program 24 with his girlfriend who at the time was, well, 25 pretty dominant of him and pretty hostile; so I</p>

<p style="text-align: right;">Page 253</p> <p>1 think it was 2004, although I'm not positive. 2 Q. Is it -- when you bring up his girlfriend, 3 you're saying that she may have influenced his 4 perceptions of the group? 5 A. I definitely believe not only that she 6 influenced his perceptions of the group but maybe 7 influenced many of his actions. 8 Q. Did you or Ms. Salzman ask Mr. O'Hara to take 9 the class, the VIP training class? 10 A. I did not. I don't know if she did. 11 Q. Did you attend the training session that he 12 refers to which took place between February 18 13 through February 22, 2004? 14 A. No. It -- yeah -- no, I have never attended 15 a training in New York City. 16 Q. Looking at this, on Page 2 he refers to 17 Content. 18 A. Page 2, Content, yes, Number III. 19 Q. If you look -- 20 A. Section III. 21 Q. And then if you look on the next page, it 22 lists a number of items. The next page, Item 4 -- 23 A. Go ahead. 24 Q. -- concerns the Explorations of Meaning 25 sessions.</p>	<p style="text-align: right;">Page 255</p> <p>1 we changed it, but I don't think so. 2 Q. Okay. Paragraph 6 he refers to the ESP 3 philosophy taking on too many "big time opponents" 4 at once (e.g., Professional Sports, the U.S. Tax 5 System, Labor Unions, Attorneys General, Religion, 6 et cetera. 7 What is taught in NXIVM classes about 8 professional sports? 9 A. Now, I don't know what he's talking about. 10 At times, Joe was extremely erratic. At the time 11 when I interacted with Joe, I had hoped that it was 12 just honest erraticism; but after we found out that 13 he was stealing money from us, it sheds it in a 14 different light, and I do believe he was stealing 15 money from us. 16 Q. Do you know one way or the other as to 17 whether anything was represented in NXIVM training 18 sessions about professional sports? 19 A. Probably somewhere. 20 Q. Do you know what's represented? 21 A. No. 22 Q. How about the U.S. tax system? You mentioned 23 yesterday that you had opinions about that -- about 24 the tax system. Are those expressed in the NXIVM 25 training sessions?</p>
<p style="text-align: right;">Page 254</p> <p>1 Do you recall reading that paragraph in 2004? 2 A. No, but I may have. I have -- I agree and -- 3 let's see. 4 (Witness reads to himself.) 5 I don't know. I think I had a 6 conversation with Joe at one point where he asked 7 what I thought in that, and I think that was pretty 8 resolved so I -- you know, this may have been in 9 this document. I'm not sure. 10 Q. When you say, "that was pretty resolved," let 11 me be clear. He's writing here about, "Exploration 12 of Meaning (EM) sessions may have gone over-the-line 13 in terms of what constitutes counseling/therapy." 14 A. Uh-huh. 15 Q. What's your -- how do you understand that 16 that issue was resolved? 17 A. Well, the question is in New York State and 18 different states what constitutes psychology; and 19 his ultimate advice to us after consulting the laws 20 but not just in New York State but in numerous 21 states was that it does not go over the line. 22 Q. Okay. Do you know if he put that advice in a 23 written document? 24 A. I don't know. I do know if it went over the 25 line, we would have changed it; and I don't know if</p>	<p style="text-align: right;">Page 256</p> <p>1 A. I don't know if it's expressed in the 2 curriculum, but people have asked me in forums. 3 Q. How about labor unions? Were those discussed 4 either in the curriculum or in forums? 5 A. I think in Shifter, we don't necessarily talk 6 about labor unions, per se, but we may reference a 7 union or a charity. I know we referenced things 8 like that to show how, for example, a not-for-profit 9 can be used as a device to cheat by a malintended 10 person. 11 Q. And is it your -- was it represented by you 12 that labor unions are devices to cheat? 13 A. No. 14 Q. What is said about Attorneys General in NXIVM 15 training sessions, either in the curricula or the 16 forum? 17 A. Well, as far as the curriculum goes, I don't 18 think there's anything. As far as the forum goes, 19 there have probably been questions relating to 20 Attorneys General. 21 Q. Such as? 22 A. I, you know, what do I feel about government; 23 what do I feel about capitalism; what do I feel 24 about socialism, you know, the current structure. 25 What do you think about having a District Attorney</p>

<p style="text-align: right;">Page 257</p> <p>1 prosecute crime. Should it be privatized; should it 2 not be privatized. I mean, there are many contexts 3 it can come up. 4 Q. Have you been asked specifically what about 5 -- what do you think about attorney -- State 6 Attorney Generals? 7 A. I don't know. I don't remember it. 8 Q. Have you been asked about your experience 9 with States' Attorneys General in connection with 10 Consumers' Buyline? 11 A. Yeah. I'm not -- I don't recall, but I 12 imagine I would be. 13 Q. And what was your -- what would have been 14 your response? 15 A. Well, State Attorney Generals are 16 politically-appointed positions. They normally have 17 as arms and legs people who are career people 18 working through them, so at times Attorney Generals 19 are politically motivated. Sometimes they have 20 aspirations for higher positions. Sometimes they 21 are people who have worked hard to get to the 22 position to make changes and make good changes. 23 It's interesting. There is an organization 24 of Attorney Generals called NAAG, N-A-A-G, which is 25 the National Association of Attorneys General. I --</p>	<p style="text-align: right;">Page 259</p> <p>1 A. Except for the one "Our School," I don't find 2 any of those representations true or -- that's not 3 something I would say, and some of them I would 4 blatantly disagree with but -- 5 Q. Have you ever heard anyone conducting a 6 NXIVM training session make these representations? 7 A. People that conduct NXIVM training sessions 8 have a certain degree of freedom to offer their own 9 opinions and things like that. I certainly would 10 not uphold these representations being made, and I 11 have spoken out against most of them except I don't 12 understand the representation "Our School," except 13 maybe he believes that -- I mean, I don't think 14 we're a school, per se, so if someone said the word 15 "school," it's something that I would discourage and 16 that wouldn't be correct, you know, and I slip into 17 saying things like school, also, so that's a 18 possibility. It's always a difficult thing. 19 You know, we're an organization. We provide 20 training. We provide education to a degree, but 21 certainly cancer being caused by self-esteem, I 22 would -- that would probably be cause for ethical 23 review if someone said such a thing. 24 Q. Have you heard someone say at a NXIVM 25 training session, "We could not re-build the</p>
<p style="text-align: right;">Page 258</p> <p>1 it is my belief -- I met some Attorneys General -- 2 Attorney Generals that I thought were great people. 3 I thought they were great in what they did, and I 4 thought it was an important position. I think the 5 position of Attorney General is an extremely 6 important position, but I don't necessarily think 7 the people that get into that position always live 8 up to it. 9 Q. And is that understand -- is that 10 understanding based on your own experiences with 11 Consumers' Buyline? 12 A. I met some Attorneys General that it was my 13 opinion that they were great, and I met others that 14 I felt at least with respect to us were more 15 politically motivated. 16 Q. I'd like you to look on this document at 17 Paragraph 8. It's on Page 3, and it carries over to 18 Page 4. 19 A. Okay, yes. 20 Q. And he refers to a number of representations 21 that he claims to have heard at this training 22 session. 23 A. Uh-huh. 24 Q. Have you made any of those representations in 25 NXIVM training sessions?</p>	<p style="text-align: right;">Page 260</p> <p>1 Pyramids in Egypt" without (sic) existing 2 construction -- "with our existing construction 3 technology and techniques"? 4 A. Well, I believe it's unknown if we could. 5 They've done some actually interesting things trying 6 to do that. I don't think it's per se part of NXIVM 7 training but... 8 Q. With all due respect, that's not my question. 9 My question is have you heard someone say that at a 10 NXIVM training session? 11 A. Not that I can recall. 12 Q. Okay. Have you heard someone say that 13 Keith Raniere is the smartest man in the world -- 14 A. No. 15 Q. -- at a training session? 16 A. No. 17 Q. Have you heard someone say at a training 18 session that psychotherapy doesn't work? 19 A. I might have heard students say things like 20 that. 21 Q. Okay. 22 A. By the way, I believe psychotherapy does 23 work. 24 Q. Does? 25 A. Yes.</p>

Page 261	Page 263
<p>1 Q. Okay. Looking under -- on Page 4 under 2 "Miscellaneous," he says, "I think that no animals 3 should be allowed to 'sit in' on the training. In 4 this regard, the liability potential concerning such 5 animals greatly outweighs their 'cute factor.'" 6 Ever come to your attention that animals 7 were sitting in on the NXIVM training sessions? 8 A. There was a blind woman who had a dog, and 9 that dog sat in on NXIVM training sessions that she 10 was involved in. She was a student. I don't know 11 -- I don't think she ever decided to become a coach, 12 but I felt that in that case it was important. 13 Q. Do you know if she was at this VIP training 14 center in February? 15 A. No. She was not, I believe. I think she's 16 only gone to trainings in Albany. 17 Q. Have you ever heard of any other instance in 18 which an animal was allowed to sit in on a training 19 session? 20 A. You mean animals as in furry things, not 21 people. I'm teasing. 22 No. 23 Q. No? 24 A. No. 25 Q. Okay. You can put that document down.</p>	<p>1 A. Then she went back to her hotel and at a 2 later point -- I think it was that same night -- 3 continued and was taken and then evaluated as having 4 -- I don't know if it was a psychotic episode but it 5 may well have been. 6 Q. Does NXIVM have medical personnel on hand at 7 its Intensives? 8 A. At times. 9 Q. But it's not a requirement? 10 A. It is not a requirement. 11 Q. Okay. I'd like to go back. Yesterday we 12 talked a little bit about the Student Enrollment 13 Application and I think at that time -- 14 A. Are we done with this document? 15 Q. Yes, we are. 16 At that time, you indicated to me that you 17 were having a little difficulty reading -- 18 A. Yes. 19 Q. -- the one I produced to you. So I've gotten 20 a copy where the Student Terms and Conditions are 21 clearer. 22 A. Thank you. 23 Q. It's a different document which I'd like to 24 mark as Ranieri 14 or 15? 25 MR. McGUIRE: 15.</p>
Page 262	Page 264
<p>1 MR. KOFMAN: What time is it? I've got 2 one more area. 3 MR. CAMPION: Ten after. 4 MR. KOFMAN: All right. 5 MR. McGUIRE: After 6. 6 MR. LEONARD: It only feels that way. 7 BY MR. KOFMAN: 8 Q. Are you aware of any instances in which 9 individuals have had breakdowns after doing an 10 Exploration of Meaning session? 11 A. After doing an Exploration of Meaning 12 session, no, and I would ask that you define 13 "breakdowns." 14 Q. Have had some sort of psychotic episode 15 after taking your class. 16 A. That's a different question. 17 Q. I understand. 18 A. I'm not capable of evaluating psychotic 19 episodes. I have known of instances where one woman 20 in particular was in a training -- and, actually, 21 there were doctors in the training, too. She was 22 brought to a hospital in Albany and evaluated by a 23 psychiatrist there. From my understanding, the 24 psychiatrist thought she was fine. 25 Q. Okay.</p>	<p>1 MR. KOFMAN: 15. 2 (One-page Student Enrollment Application 3 for Aaron Kassin marked Confidential was received 4 and marked Defendant's Exhibit Ranieri-15 for 5 Identification.) 6 BY MR. KOFMAN: 7 Q. Ranieri-15 is a one-page document. It says 8 Student Enrollment Application of Aaron Kassin, and 9 it was produced to us as a single page. 10 MR. McGUIRE: You got another copy over 11 there? 12 MR. KOFMAN: Did I not produce it over 13 on this side, or are there any extras? 14 MR. LEONARD: We're okay. 15 Q. Is that at least the first page of the form 16 of Student Enrollment Application that NXIVM uses? 17 A. I can't tell. It looks like the bottom was 18 cut off, but probably just a photocopying error. It 19 doesn't have a revision date. 20 Q. Taking a look under "Student Terms and 21 Conditions" at Paragraph 1 -- 22 A. Yes. 23 Q. -- it says, "These materials, methods and 24 information cannot be copied, duplicated, 25 transmitted, taught or otherwise used" --</p>

Page 265

1 A. Hold on. I'm in the wrong place.
2 Okay. I'm sorry. Yes, I'm with you.
3 Q. What are you referring to as the "materials"
4 there in that sentence?
5 A. It says, "All materials, methods and
6 information contained in and represented through
7 Executive Success Programs (ESP) are essential
8 assets of ESP acquired at great time and expense."
9 So I guess that's all materials, methods and
10 information.
11 Q. What do you mean by the term "materials"?
12 A. When you say what do I mean, I am not the
13 person who finally wrote this. This is a lawyer.
14 Q. Okay. You did review it, though, with a
15 lawyer; correct?
16 A. I probably -- I -- I don't think I reviewed
17 it with a lawyer. I believe I put in certain things
18 from my other company that went into a hopper, and
19 the lawyer came out with the final stuff.
20 Q. Did you review it after the lawyer came out
21 with the final stuff?
22 A. Doubtful.
23 Q. Okay. Were you concerned as to that it be
24 sufficiently protective?
25 A. Yes.

Page 266

1 Q. But you didn't review it after the lawyer
2 drafted it?
3 A. I don't feel I'm good enough.
4 Q. Okay. Do you have an understanding sitting
5 here today what's meant by the term "materials"?
6 A. I think I do. I mean, from a layperson's
7 point of view, it appears to be everything.
8 Q. "Everything" meaning what?
9 A. Any materials, any papers that I get, any
10 pictures, any -- I don't know -- tapes, any -- it
11 says "methods" also and "information" which means
12 nonverbal, verbal; any data.
13 Q. So the information can include things that
14 are nonverbal?
15 A. I imagine.
16 Q. Such as what?
17 A. If someone, for example, was doing an
18 artistic presentation and they did a certain move,
19 that probably would be considered that information.
20 Q. And they could not disclose that move outside
21 of the walls of NXIVM?
22 A. Yeah, probably.
23 Q. Would it be safe to say that information is
24 anything that they hear during the course of a NXIVM
25 training session --

Page 267

1 A. Yes, I --
2 Q. -- or see?
3 A. From a layperson's perspective, yes.
4 Q. Okay, and it says that the infor --
5 "materials, methods and information cannot be
6 copied, duplicated, transmitted, taught or otherwise
7 used."
8 What do you understand the phrase "otherwise
9 used" to mean?
10 A. Well, on an ethical level -- if you're
11 commenting on the rule, it means that the first
12 portion of this clause, the "materials, methods and
13 information cannot be copied, duplicated,
14 transmitted, taught." In other words, I'm taking
15 materials and somehow getting them over to you; and
16 then I'm also potentially using them, and whatever
17 is not covered in what is listed is "or otherwise
18 used." So not only transmitted but also
19 transformed, also utilized for other purposes at
20 all. I think it's somewhat inclusive.
21 Q. Would "use" include talking about it with
22 family members?
23 A. Certain aspects. You know, talking about my
24 experience is one thing. Talking -- telling my
25 family members what the materials are is another.

Page 268

1 Q. Would this paragraph prohibit me from going
2 to my wife after I took one of your training
3 sessions and saying, you know, I saw this guy named
4 Keith Raniere, and he wants me to call him Vanguard
5 and bow down to him when he walks in the room; is
6 that -- would that violate this paragraph?
7 A. In ethic or --
8 MR. CAMPION: Object to the form of that
9 question.
10 Q. Would it be your understanding that that
11 would violate this paragraph?
12 A. In ethic or in rule?
13 Q. In rule.
14 A. Probably.
15 Q. Okay.
16 A. But we are an ethical organization, and
17 that's why and what we instruct the attorneys to do
18 is try to make these in such a way that it allows
19 for that. When a person comes in and takes the
20 course, they sign a long form which is more explicit
21 about derivative works and things like that. So we
22 encourage people to go and talk about their
23 experiences, both positive and negative, with their
24 families and they do.
25 Q. But that might violate the strict terms of

Page 269	Page 271
<p>1 this paragraph?</p> <p>2 A. Well, if they were to go and reveal things</p> <p>3 that were trade secrets, it might. What you said,</p> <p>4 depending on a number of circumstances, might</p> <p>5 violate the rule of this but certainly not the</p> <p>6 ethic.</p> <p>7 Q. Would it depend upon the person's intent?</p> <p>8 A. It depends on more than that, but yes.</p> <p>9 Q. That would be one factor?</p> <p>10 A. Yes.</p> <p>11 Q. What would the other things it depends on be?</p> <p>12 A. Are they a competitor or not and have they</p> <p>13 come into the program under provisional means so</p> <p>14 that if they start describing this to their wife,</p> <p>15 for example, who might be a therapist or might be a</p> <p>16 trainer for Anthony Robbins or something like that</p> <p>17 and you gave me a statement, and the actual</p> <p>18 statement you gave me I suspect would not be a</p> <p>19 problem under the Rules, but a generalized form of</p> <p>20 that statement where someone starts to say, "This</p> <p>21 question was asked. This specifically is what</p> <p>22 happened," may violate it if it is a competitor</p> <p>23 trans -- or transmitting it to a competitor who</p> <p>24 happens to be the person's wife.</p> <p>25 Q. So two different people can say the same</p>	<p>1 AFTERNOON SESSION</p> <p>2</p> <p>3 THE VIDEOGRAPHER: We're back on the</p> <p>4 record at 1:17.</p> <p>5</p> <p>6 KEITH ALAN RANIERE, previously</p> <p>7 sworn, resumed the stand and testifies on his oath</p> <p>8 as follows:</p> <p>9</p> <p>10 CONTINUED DIRECT EXAMINATION BY MR. KOFMAN:</p> <p>11 Q. Okay. Mr. Ranieri, I have a few more</p> <p>12 questions for you before concluding my portion of</p> <p>13 the deposition.</p> <p>14 I want to make sure I understand a few areas.</p> <p>15 Did any of your attorneys in this case ever instruct</p> <p>16 you to preserve documents?</p> <p>17 A. No, I don't believe so. Instructed that if I</p> <p>18 had any e-mails they shouldn't be deleted. I should</p> <p>19 go through them or --</p> <p>20 Q. Okay. Who gave you that instruction?</p> <p>21 A. Bob Leonard.</p> <p>22 Q. Okay. Anybody before then?</p> <p>23 A. I didn't have any attorneys in this case</p> <p>24 before then.</p> <p>25 Q. Did any of NXIVM's attorneys ever give you</p>
Page 270	Page 272
<p>1 thing, and in one case it would violate the rule and</p> <p>2 in one case it would not?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 MR. KOFMAN: I have no other questions</p> <p>6 at this point. Let's -- maybe we should take our</p> <p>7 lunch break.</p> <p>8 MR. CAMPION: Sure.</p> <p>9 MR. KOFMAN: I'll check my notes and see</p> <p>10 if I have anything in follow-up.</p> <p>11 MR. CAMPION: Back here at 1:15.</p> <p>12 THE VIDEOGRAPHER: Going off the record</p> <p>13 at 12:20.</p> <p>14</p> <p>15 (Witness excused.)</p> <p>16 (At this point, the luncheon recess was</p> <p>17 taken.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 that information?</p> <p>2 A. No.</p> <p>3 Q. Did anybody --</p> <p>4 A. Not specifically.</p> <p>5 Q. Did anybody from NXIVM -- did anyone from</p> <p>6 NXIVM itself ever ask you to preserve documents or</p> <p>7 e-mails?</p> <p>8 A. No.</p> <p>9 Q. Did Kristin Keeffe ever show you copies of</p> <p>10 the document production requests that were served in</p> <p>11 this matter?</p> <p>12 A. She's shown me a number of different things,</p> <p>13 things that related to me. I -- I'm sure I didn't</p> <p>14 see the whole document request, but I know that</p> <p>15 there were -- there was a document request for</p> <p>16 things from Nycap@rr.com.</p> <p>17 Q. Any other requests that you believe she</p> <p>18 showed you?</p> <p>19 A. Well, there is a document request of me.</p> <p>20 That's all I know.</p> <p>21 Q. How about document requests directed to</p> <p>22 NXIVM? Did she show you any of those?</p> <p>23 A. No.</p> <p>24 Q. I'm sorry. You have to answer verbally.</p> <p>25 A. Oh, no.</p>

<p style="text-align: right;">Page 273</p> <p>1 Q. Did she read to you over the phone or 2 communicate orally to ask you to look for documents 3 that had been requested of NXIVM? 4 A. She's requested me to look for certain 5 things, but a lot of the times she would request 6 something I don't have them, for example, audio 7 recordings or things like that. 8 Q. Did she -- when she would ask you to look for 9 certain things, how would she communicate with you? 10 Was it in person or over the phone? 11 A. Either or. 12 Q. Okay. Did anyone from -- anyone assist you 13 in looking for responsive documents or materials? 14 A. I'm not sure because there was a storage bin 15 that has my stuff in it that I allowed NXIVM people 16 to go through. So I did not, per se, look for it; 17 but anything that was in there would have been given 18 over. 19 Q. Where is the storage bin located? 20 A. I'm not the person who rents it, but it has 21 my stuff in it. I think it's Exit 9 Storage, but 22 I'm not sure. There is a few different storage 23 facilities. 24 Q. And this is -- do you know who from NXIVM 25 went through it?</p>	<p style="text-align: right;">Page 275</p> <p>1 Q. Is that -- what's that office used for? 2 A. I don't know. 3 Q. Have you ever submitted Rational Inquiry 4 Method to peer review? 5 A. No, not that I -- not in any form. 6 Q. Have you ever written anything about it to 7 scientific journals? 8 A. To scientific journals. I don't know if 9 that's considered a scientific journal, possibly. 10 Q. What -- what are you thinking of? 11 A. There is a -- a magazine that is distributed 12 to the academic community. I would probably not 13 refer to it as a journal, but I've written articles 14 in there. 15 Q. What's the name of the magazine? 16 A. Conocimiento is it, I think. It's Spanish. 17 I don't speak Spanish. 18 Q. Somebody translated the articles into Spanish 19 for you? 20 A. Yes. 21 Q. When did you start writing articles for 22 Conocimiento? 23 A. About three years ago, I think. 24 Q. Did you get paid for these articles? 25 A. No.</p>
<p style="text-align: right;">Page 274</p> <p>1 A. No. 2 Q. This is material that's in addition to what 3 you keep at your home? 4 A. Yes. 5 Q. Okay. Did anyone assist you in looking for 6 materials in your home? 7 A. No. 8 Q. Okay. It was you alone who did the search? 9 A. Yes. 10 Q. Where does NXIVM presently maintain offices? 11 A. I don't know all the places. There is an 12 office in Upstate New York. There's -- I think 13 there's an office near -- near the 455 New Karner 14 Road complex. I think there's an office in 15 Monterrey, Mexico. I think there's also an office 16 in Mexico City, but those are not directly NXIVM 17 offices, I believe. I think they're offices in some 18 sort of either franchise agreement or something like 19 that. I'm not sure of the nature of that agreement. 20 Q. The office in Upstate New York, where is that 21 located? 22 A. I'm not exactly sure. 23 Q. Any idea what city or county? 24 A. I think it's in Niagara. Yeah, I think it's 25 in Niagara.</p>	<p style="text-align: right;">Page 276</p> <p>1 Q. I'm sorry. You have to speak up. 2 A. Oh, I'm sorry. No. 3 Q. And how many articles would you say you've 4 written? 5 A. Um, there are two primary ways that I write 6 an article. One, I write it directly myself; and 7 the other I write it in collaboration with someone 8 where I download the concepts, so to speak. I speak 9 with them about some of the philosophical things in 10 the article, some of the structure of the article, 11 and they write it. Sometimes I will write portions 12 of those, so that's how the articles are normally 13 written. 14 Q. Are all of the articles in your name, or do 15 you share a byline with someone on any of them? 16 A. I share a byline with people on some of them. 17 Q. Who are some of the people you share bylines 18 with? 19 A. Ivy Nevares spelled Ivy, I-v-y. 20 Q. I think you mentioned her yesterday. 21 Anyone else? 22 A. Farouk Rojas translates, and as a translator 23 he and Ivy who are both bilingual may change content 24 to some degree. So he's up in the byline, too, but 25 as a translator.</p>

<p style="text-align: right;">Page 277</p> <p>1 Q. Where is Conocimiento published?</p> <p>2 A. I believe it's Monterrey, Mexico.</p> <p>3 Q. How did you come to write articles for -- on</p> <p>4 Rational Inquiry Method for Conocimiento?</p> <p>5 A. The head of Conocimiento's name is Luis Todd</p> <p>6 who he's like the representative to UNESCO in the</p> <p>7 United Nations. He's head of one of the major</p> <p>8 university medical schools. He -- in front of the</p> <p>9 book, actually, there is his biography. He opened</p> <p>10 something like 60 different majors, and he is a</p> <p>11 prominent person.</p> <p>12 He took our course and believes very strongly</p> <p>13 in what we do, so he wrote the Forward to the book</p> <p>14 that I published and also allows us to have a</p> <p>15 column, if you will, or an article section within</p> <p>16 his magazine.</p> <p>17 Q. How many of these columns have you written?</p> <p>18 A. Oh, over three years I've written probably</p> <p>19 about -- I'm guessing -- 70.</p> <p>20 Q. Have you retained copies of these articles?</p> <p>21 A. Yes.</p> <p>22 MR. KOFMAN: Okay. I'm going to make a</p> <p>23 request for copies of the articles that Mr. Ranieri</p> <p>24 has written for Conocimiento, and I'll follow that</p> <p>25 up in the letter.</p>	<p style="text-align: right;">Page 279</p> <p>1 with?</p> <p>2 A. I don't know what you mean by "involved</p> <p>3 with."</p> <p>4 Q. Are you familiar with the term Vanity Press?</p> <p>5 A. No.</p> <p>6 Q. Does Ethical Press publish -- has Ethical</p> <p>7 Press published any books other than The Odin and</p> <p>8 the Sphinx?</p> <p>9 A. No.</p> <p>10 Q. It's no?</p> <p>11 A. No. That's correct.</p> <p>12 Q. Okay. Have you received any royalties from</p> <p>13 publication of this?</p> <p>14 A. No.</p> <p>15 Q. And you indicated that -- strike that.</p> <p>16 Is this a work of fiction or nonfiction?</p> <p>17 A. I think it's probably both. There are --</p> <p>18 it's a compendium of articles. Some of them are</p> <p>19 more fictional. Some of them are more academic.</p> <p>20 Some of them are quite academic, and some of them</p> <p>21 are quite fictional.</p> <p>22 Q. Okay. Are these books sold at NXIVM training</p> <p>23 centers?</p> <p>24 A. I imagine so. I don't know for sure.</p> <p>25 Q. Have you received any royalties from the</p>
<p style="text-align: right;">Page 278</p> <p>1 MR. CAMPION: We'll consider it then,</p> <p>2 yes.</p> <p>3 MR. KOFMAN: Okay.</p> <p>4 (Request.)</p> <p>5 THE WITNESS: They are not to be</p> <p>6 distributed outside of this, yes?</p> <p>7 MR. KOFMAN: They would be subject --</p> <p>8 your attorneys have the right to designate them as</p> <p>9 confidential pursuant to the Order entered by the</p> <p>10 Court.</p> <p>11 THE WITNESS: Also the Forward?</p> <p>12 MR. CAMPION: We're going to discuss</p> <p>13 that later.</p> <p>14 THE WITNESS: Thank you.</p> <p>15 BY MR. KOFMAN:</p> <p>16 Q. Okay. You mentioned that I believe that you</p> <p>17 published a book.</p> <p>18 A. Yes.</p> <p>19 Q. What's the name of the book?</p> <p>20 A. The Odin and the Sphinx.</p> <p>21 Q. What is it?</p> <p>22 A. Odin and the Sphinx.</p> <p>23 Q. What's the name of the publisher?</p> <p>24 A. Ethical Publishing.</p> <p>25 Q. Is that an in print that you're involved</p>	<p style="text-align: right;">Page 280</p> <p>1 book?</p> <p>2 A. No.</p> <p>3 Q. Do you have any agreement to receive</p> <p>4 royalties?</p> <p>5 A. No.</p> <p>6 Q. Does the book or any of the articles in the</p> <p>7 book discuss the Rational Inquiry Method?</p> <p>8 A. Superficially probably. I mean, it is</p> <p>9 mentioned.</p> <p>10 Q. Okay. Do any of the articles that you've</p> <p>11 written for Conocimiento contain what you'd consider</p> <p>12 trade secrets of NXIVM?</p> <p>13 A. No.</p> <p>14 Q. Does it discuss particulars of the Rational</p> <p>15 Inquiry Method?</p> <p>16 A. No.</p> <p>17 Q. How about The Odin and the Sphinx, does that</p> <p>18 contain any trade secrets?</p> <p>19 A. Those are articles. No.</p> <p>20 Q. When was the book published, Odin and the</p> <p>21 Sphinx?</p> <p>22 A. A year ago, something like that. I am not</p> <p>23 sure of the exact date.</p> <p>24 Q. Do you know how many copies were published?</p> <p>25 A. I think there was -- it's a small initial run</p>

<p style="text-align: right;">Page 281</p> <p>1 like 5,000 or something.</p> <p>2 Q. Do you maintain copies?</p> <p>3 A. I have a few.</p> <p>4 MR. KOFMAN: I'm going to make a request</p> <p>5 for that as well.</p> <p>6 MR. CAMPION: Put it in the letter.</p> <p>7 MR. KOFMAN: Okay.</p> <p>8 (Request.)</p> <p>9 Q. Who wrote the Forward to that book? Is that</p> <p>10 Mr. Todd?</p> <p>11 A. Luis Todd, yes.</p> <p>12 Q. Have you ever been -- strike that.</p> <p>13 Is there a reason that you haven't submitted</p> <p>14 Rational Inquiry Method to peer review?</p> <p>15 A. I think there are several reasons. We want</p> <p>16 to have more solid research into it. The research</p> <p>17 and things like that we've done is preliminary, and</p> <p>18 also because of this lawsuit there are a lot of</p> <p>19 restrictions and constrictions relating to that.</p> <p>20 Q. When you say the research that you've done is</p> <p>21 preliminary, what do you mean?</p> <p>22 A. The psychological assay, the psych -- what</p> <p>23 you call maybe the psychological study, it's just</p> <p>24 sort of an entry point into research. You know,</p> <p>25 when you do research the first thing you want to</p>	<p style="text-align: right;">Page 283</p> <p>1 A. I'm sorry. I didn't hear.</p> <p>2 Q. I'm sorry. Have you ever been asked by</p> <p>3 anyone at NXIVM to identify who NXIVM's competitors</p> <p>4 are?</p> <p>5 A. I've been asked what my opinions are on that,</p> <p>6 yes.</p> <p>7 Q. Who were you asked that by?</p> <p>8 A. Arlen, I think Kristin, I think I have had a</p> <p>9 discussion with Nancy about it. I think not</p> <p>10 pertaining to a legal case at all various other</p> <p>11 people who are marketers.</p> <p>12 Q. And what have you told those people other</p> <p>13 than your attorney, or other than Arlen Olsen what</p> <p>14 have you told them as to who NXIVM's competitors</p> <p>15 are?</p> <p>16 A. Well, I think as a general rule, as I</p> <p>17 expressed before, anyone who wants to increase joy.</p> <p>18 Q. Okay. Have you ever made a list of who</p> <p>19 specific -- who are -- what are specific entities</p> <p>20 that are competitors?</p> <p>21 A. No. I think I've spoken of people and</p> <p>22 directed people on how to find -- like, for example,</p> <p>23 people in the -- in the Forbes article there were a</p> <p>24 number of firms that were seen as competitors to us</p> <p>25 that were -- we were nestled in as far as in a list.</p>
<p style="text-align: right;">Page 282</p> <p>1 find out if there's a legitimate effect, and then</p> <p>2 you want to examine the legitimate effect so that's</p> <p>3 the nature of it.</p> <p>4 Q. And do you have -- is it your understanding</p> <p>5 the jury is still out as to whether there's a</p> <p>6 legitimate effect from the Rational Inquiry Method?</p> <p>7 A. I think there's a legitimate effect.</p> <p>8 Q. But has that been demonstrated by research?</p> <p>9 A. I think it's been demonstrated by the study,</p> <p>10 and the study only examines a limited portion. We</p> <p>11 do -- we are set up to do some brain research, which</p> <p>12 we will do, and that will give much more hard data.</p> <p>13 Q. Is that Mr. Solomon's study?</p> <p>14 A. Mr. Solomon's study is the psychological</p> <p>15 study that I'm referring to, yes.</p> <p>16 Q. And when you say it only does a limited</p> <p>17 portion, what do you mean, his study? A limited</p> <p>18 portion of the modules?</p> <p>19 A. It's giving -- well, it is -- it's a limited</p> <p>20 portion of the modules, limited -- there are, you</p> <p>21 know, many limitations when you do something like</p> <p>22 that. It does not study various aspects of the</p> <p>23 technology.</p> <p>24 Q. Okay. Have you ever been asked to by anyone</p> <p>25 at NXIVM to identify --</p>	<p style="text-align: right;">Page 284</p> <p>1 So I directed people. I said, "Well, you can look</p> <p>2 there. There are a bunch of those," and things like</p> <p>3 that.</p> <p>4 Q. Where else did you tell people to look?</p> <p>5 A. Well, I think any -- any of those fields, any</p> <p>6 of the fields that stem from them. Any of -- we've</p> <p>7 done corporate trainings. Any of the corporations,</p> <p>8 those vertical markets, things like that.</p> <p>9 Q. So corporations -- I'm sorry. Let me make</p> <p>10 sure I understand this. A corporation that you've</p> <p>11 done training for could be a competitor?</p> <p>12 A. No, people who would also train those</p> <p>13 corporations. I'm sorry.</p> <p>14 Q. Okay. When you do a corporate training, do</p> <p>15 you use the ration -- do you give them -- what</p> <p>16 courses do you teach when you do corporate training?</p> <p>17 A. It depends on the corporation.</p> <p>18 Q. Would it be something different than the</p> <p>19 Intensives?</p> <p>20 A. It can be.</p> <p>21 Q. You would not -- have you done any 16-day</p> <p>22 Intensives for corporations?</p> <p>23 A. I'm not sure.</p> <p>24 MR. KOFMAN: Okay. At this point, I</p> <p>25 don't have any more questions. Thank you for your</p>

<p style="text-align: right;">Page 285</p> <p>1 time.</p> <p>2 I'm sure my colleagues down the row</p> <p>3 have some questions for you. I'm going to slide</p> <p>4 down now.</p> <p>5 THE WITNESS: Okay. Thank you.</p> <p>6</p> <p>7 CROSS-EXAMINATION BY MR. LANDY:</p> <p>8 Q. Good afternoon, Mr. Ranieri. My name is</p> <p>9 Robert Landy. I am a lawyer with the firm of</p> <p>10 Friedman Kaplan Seiler & Adelman LLP. We represent</p> <p>11 Juval Aviv and Interfor, Incorporated.</p> <p>12 I'll be asking you a few questions this</p> <p>13 afternoon. I'd ask that you observe the same</p> <p>14 general ground rules that Mr. Kofman explained.</p> <p>15 Let's try not to speak over each other. You have to</p> <p>16 answer with words as opposed to gestures or sounds.</p> <p>17 A couple other quick terminology ground rules</p> <p>18 just so we understand each other. When I say</p> <p>19 "NXIVM," I'll be referring to NXIVM Corporation and</p> <p>20 Executive Success Programs collectively. If you</p> <p>21 ever have an answer that relates to only one of</p> <p>22 those two, tell me.</p> <p>23 If I say "the NXIVM defendants," I'm</p> <p>24 referring to NXIVM Corporation, Executive Success</p> <p>25 Programs, Kristin Keeffe, Nancy Salzman and yourself</p>	<p style="text-align: right;">Page 287</p> <p>1 A. Yes.</p> <p>2 Q. Who is Frank Parlato, Jr.?</p> <p>3 A. To my knowledge, he was someone that was</p> <p>4 hired I think by NXIVM as -- I think he was a</p> <p>5 publicist. I think he also assisted in some real</p> <p>6 estate dealings.</p> <p>7 Q. What do you mean when you say he was a</p> <p>8 publicist?</p> <p>9 A. He I believe was hired to interface with</p> <p>10 like newspapers, reporters, people like that, and to</p> <p>11 create positive press.</p> <p>12 Q. And is it -- start that one again.</p> <p>13 Was he hired to speak to the newspapers and</p> <p>14 reporters on NXIVM's behalf?</p> <p>15 A. I imagine so. I don't know for certain.</p> <p>16 Q. Do you know whether or not Mr. Rob -- strike</p> <p>17 that.</p> <p>18 Do you know whether or not Mr. Parlato ever</p> <p>19 used an alias when speaking to newspaper reporters?</p> <p>20 A. I don't -- I don't imagine he would, but he</p> <p>21 might because I don't agree with his style.</p> <p>22 Q. What about his style do you not agree with?</p> <p>23 A. To me, he seemed aggressive.</p> <p>24 Q. Do you know if Mr. Parlato is a lawyer?</p> <p>25 A. I don't believe he is.</p>
<p style="text-align: right;">Page 286</p> <p>1 collectively. I understand that you have, you know,</p> <p>2 certain positions with respect to what your</p> <p>3 connection to NXIVM are, but this is just</p> <p>4 terminology. I'm talking about all of them. If</p> <p>5 your answer requires you to delineate between them,</p> <p>6 please do so.</p> <p>7 Again, as Mr. Kofman said, if you answer my</p> <p>8 question, I'm going to assume that you understand</p> <p>9 it. If you don't understand it, let me know, and</p> <p>10 I'll try to rephrase it.</p> <p>11 Have you ever heard of a man named</p> <p>12 Phil Robertson?</p> <p>13 A. The name sounds familiar.</p> <p>14 Q. Do you know whether or not Mr. Robertson is</p> <p>15 an actual person?</p> <p>16 A. No. I -- I don't know who he is.</p> <p>17 MR. McGUIRE: Did you say Robinson or</p> <p>18 Robertson?</p> <p>19 MR. LANDY: Robertson.</p> <p>20 MR. McGUIRE: Robertson?</p> <p>21 MR. LANDY: Robertson.</p> <p>22 MR. McGUIRE: Thank you.</p> <p>23 BY MR. LANDY:</p> <p>24 Q. Have you ever heard of a gentleman by the</p> <p>25 name of Frank Parlato, Jr.?</p>	<p style="text-align: right;">Page 288</p> <p>1 Q. Have you ever met him?</p> <p>2 A. Yes.</p> <p>3 Q. When did you first meet him?</p> <p>4 A. I think I met him first at Nancy's house.</p> <p>5 Q. "Nancy" is Ms. Salzman, I assume.</p> <p>6 A. Yes, Nancy Salzman.</p> <p>7 Q. The question was when.</p> <p>8 A. The what?</p> <p>9 Q. The question was when.</p> <p>10 A. Oh, when. Maybe two years ago. Was it two?</p> <p>11 Wait, maybe it's -- maybe it's as much as two years</p> <p>12 ago.</p> <p>13 Q. Do you recall did you speak with him at that</p> <p>14 point?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recall what you spoke about?</p> <p>17 A. I think he was telling me about himself and</p> <p>18 advertising himself to me.</p> <p>19 Q. You said he was hired by NXIVM.</p> <p>20 Do you have an understanding of whether he</p> <p>21 was an employee of NXIVM?</p> <p>22 A. I don't believe so.</p> <p>23 Q. Do you think he was something else?</p> <p>24 A. Yeah. I think he was an independent</p> <p>25 contractor.</p>

Page 289	Page 291
<p>1 Q. Okay. Is he still an independent contractor 2 for NXIVM? 3 A. I doubt it. I -- that's -- I haven't heard 4 anything from him in like a year. 5 Q. Have you ever heard of a man named 6 Juval Aviv? 7 A. Yes. 8 Q. Did you ever speak to Mr. Parlato about 9 Juval Aviv? 10 A. I'm not sure. I imagine I might have, but I 11 can't recall any conversation. 12 Q. Have you ever heard of a company called 13 Interfor, Incorporated? 14 A. Yes. 15 Q. Have you ever spoken to Mr. Parlato about 16 Interfor? 17 A. I may have, but I don't recollect any 18 conversation. 19 Q. Have you ever spoken to Mr. Parlato about 20 Rick Ross? 21 A. I believe so, yes. 22 Q. How many times did you do that? 23 A. A handful, not many but more than two. 24 Q. What did you discuss? 25 A. Frank had very strong opinions about how</p>	<p>1 Heller firm -- the first name escapes me at the 2 moment -- and Joe O'Hara. 3 Q. When did you first hear of him? 4 A. I heard from Joe O'Hara that this attorney 5 from Nolan & Heller is the name -- Nolan is the 6 first name -- had two private investigators or 7 investigation firms that they worked with. One of 8 them was I believe out of Washington, and the other 9 was Interfor. They had said that Juval Aviv was in 10 the Mossad and that he had gotten back -- I think he 11 had gotten back some sort of a kidnapped child or 12 something that impressed them quite a bit for one of 13 their clients, so Joe wanted to know what I thought. 14 Q. Did you tell Joe what you thought? 15 A. Uh-huh. 16 Q. What did you think? 17 A. Hire both firms. I don't know. I think 18 that's what ultimately happened, but have both firms 19 work on something simple and compare the results and 20 see which one you like better. I ultimately don't 21 think that's what they did but... 22 Q. Have you ever spoken to Juval Aviv? 23 A. Yes. 24 Q. How many times? 25 A. Once.</p>
Page 290	Page 292
<p>1 NXIVM should respond to media and should be -- 2 respond to Rick Ross' columns on the web and things 3 like that. So in that mix that was mentioned. 4 Frank Parlato's expressed opinion towards Rick Ross 5 was not very positive. 6 Q. What was his expressed opinion towards 7 Rick Ross? 8 A. I won't repeat the words, per se, but just 9 he believed that Rick Ross was the lowest of the 10 low. 11 Q. Not repeating the words to avoid the use of 12 profanity? 13 A. In part. In part -- if I use my version of 14 profanity, which is probably -- it's certainly not 15 Frank's version of profanity, I -- I will either 16 overstate it or understate it. I'm not -- I'm not a 17 big user of profanity. 18 Q. Who is Juval Aviv? 19 A. I believe he's a private investigator. I 20 believe he is the principal of Interfor, and I 21 believe he's someone that worked through NXIVM. 22 Q. Worked through -- what do you mean by "worked 23 through NXIVM"? 24 A. Was an independent contractor for NXIVM, I 25 believe it was through their attorney firm, the</p>	<p>1 Q. When was that? 2 A. He came to Nancy's house for dinner. 3 Q. When was that? 4 A. I don't know. It was a few years ago. Nancy 5 was in her other house, the Grant Hill address. 6 Q. Do you know how long that meeting was after 7 you hired -- well, strike that. Let me start again. 8 Was that before or after Interfor was hired? 9 A. I believe it was after. 10 Q. Okay. Do you know how long after? 11 A. No, because I don't know -- I don't know what 12 you mean by "hired." It was -- Juval was already 13 doing work for NXIVM, for Joe O'Hara, for Nolan & 14 Heller. I don't mean to get technical with it but 15 it is -- I don't know the nature of all those 16 interrelationships. 17 Q. Do you know what season it was when you met 18 with him? 19 A. I think it was fall, but I'm honestly not 20 sure. 21 Q. Mr. Ranieri, I'm going to show you a document 22 that's been previously marked as NXIVM Exhibit 14. 23 I'd ask you to briefly take a look at it. You'll 24 notice that the text is rather small, and it's a 25 little bit blurry, but I'll direct you to a couple</p>

Page 293

1 of fairly short parts that we can discuss.
2 A. Okay.
3 MR. CAMPION: Is this Ranieri-16?
4 MR. LANDY: No, let's just keep it.
5 It's already -- you'll see it's got the stamp from
6 the last time --
7 MR. CAMPION: That's good. Thank you.
8 MR. LANDY: So no reason to mark it
9 twice.
10 MR. CAMPION: Okay.
11 BY MR. LANDY:
12 Q. Sir, I represent that I'm showing you a copy
13 of an article from the Village Voice. It's not the
14 entire newspaper, just the pages on which the
15 article appears, and my first question is whether
16 you've ever seen the article before.
17 A. No. I know of its existence.
18 Q. Did you ever speak to anyone about this
19 article?
20 A. Yes.
21 Q. Who did you speak to about this article?
22 A. I've spoken to a few people about it, but I
23 believe Frank told me that -- one of the reasons why
24 I didn't read the article was that it was a bunch of
25 mud and everyone was dirty.

Page 294

1 Q. And by "Frank" you mean Frank Parlato?
2 A. Frank Parlato, yes.
3 Q. Okay. Were you aware that this article was
4 going to be published before it came out?
5 A. I don't think so, no.
6 Q. Okay. So let's turn to -- I actually want to
7 find something. Give me -- bear with me one moment.
8 THE VIDEOGRAPHER: Excuse me. We have
9 to change tapes.
10 MR. LANDY: That worked out.
11 THE VIDEOGRAPHER: Going off at 1:49.
12 We're back on the record at 1:50.
13 MR. LANDY: We'll come back to that.
14 Q. Okay. Can you first turn to -- count from
15 the back -- you'll get there faster. The fourth
16 from the last page, which bears the Bates numbers
17 Interfor 0452.
18 Just for the record, NXIVM -- NXIVM 14 bears
19 the Bates number Interfor 0442 through Interfor
20 0455.
21 A. "Fitness Health" and "Beauty" at the top of
22 the page?
23 Q. Yes, that's in the advertisement section.
24 A. Yes.
25 Q. Okay. You'll see in the very last paragraph,

Page 295

1 which does not complete on this page, the first
2 sentence starts or is, "According to NXIVM spokesman
3 Robertson, company leaders were appalled to learn
4 what Aviv was up to."
5 It's slightly cut off.
6 Do you know who "NXIVM spokesman Robertson"
7 was?
8 A. No.
9 Q. All right. I can represent to you -- and I
10 can go back and find it in the article if your
11 attorneys think it's worth the time -- that
12 Robertson is identified as Phil Robertson is his
13 full name.
14 A. Well, no, I don't -- I don't know who that
15 is.
16 Q. I'll also represent to you that during her
17 deposition Kristin Keeffe testified that Phil
18 Robertson was, in fact, Frank Parlato by alias.
19 A. That may be so.
20 Q. Do you have any reason to believe that's not
21 true?
22 A. No. I have reasons to believe it is true
23 because I would suspect I would know the names of
24 the NXIVM spokesperson and I never heard of this
25 person so...

Page 296

1 Q. Do you know what's meant by, "Company leaders
2 were appalled to learn what Aviv was up to"?
3 A. I can hazard a guess. I --
4 MR. CAMPION: Do you want him to?
5 MR. LANDY: Yeah.
6 MR. CAMPION: Go ahead.
7 THE WITNESS: Excuse me. I'm sorry.
8 Continuing...
9 A. I had heard that -- and I did not hear this
10 from Aviv himself -- that Aviv believed that the
11 Legionnaires of Christ in Mexico had paid something
12 like \$5 million to Senator -- ex-Senator D'Amato to
13 go and go against us in the courts and various other
14 things and that he had a neighbor and that that
15 neighbor could talk to D'Amato and stop him from
16 doing damage to us.
17 He also supposedly was involved in a
18 government program with astro projection where they
19 sort of sit around and meditate or whatever and go
20 and spy on people and that that's how he derived
21 some of his information.
22 Q. I will direct your attention to the following
23 page, which is Interfor 053 (sic), the first full
24 non-advertising paragraph on that page.
25 MR. LEONARD: What page?

<p style="text-align: right;">Page 297</p> <p>1 MR. LANDY: 0453.</p> <p>2 Q. It's one page, one more page. It's Page 34</p> <p>3 of the -- of the magazine?</p> <p>4 A. I can't read it, but if you read it.</p> <p>5 Q. The first full paragraph goes as such,</p> <p>6 "Robertson says that NXIVM was barely in contact</p> <p>7 with Aviv, whom O'Hara hired on its behalf for</p> <p>8 entirely legal investigations. 'We knew nothing</p> <p>9 about a sting,' he said. 'We had no participation</p> <p>10 in any sting. We found out about it afterwards.</p> <p>11 What we saw was, a corrupt attorney hires a corrupt</p> <p>12 private investigator...' There's ellipses. "'We</p> <p>13 certainly didn't -- and would not -- authorize</p> <p>14 illegal activities. That was his doing, and I</p> <p>15 understand that's his nature. He's pretty much a</p> <p>16 loose cannon.'"</p> <p>17 Do you know what Robertson is talking about</p> <p>18 in that paragraph?</p> <p>19 A. Well, what you just --</p> <p>20 MR. McGUIRE: Object to the form.</p> <p>21 Q. I'll rephrase it.</p> <p>22 Do you know what the person who is identified</p> <p>23 as Robertson is discussing in that paragraph?</p> <p>24 A. To some degree, the paragraph that you read</p> <p>25 me seemed to be -- have some truth in it. I don't</p>	<p style="text-align: right;">Page 299</p> <p>1 barely in contact with Aviv."</p> <p>2 I don't know if that's true or false. I</p> <p>3 believe that Kristin was friends to some degree</p> <p>4 with your client, with --</p> <p>5 Q. By that you mean Juval Aviv?</p> <p>6 A. Juval Aviv, yes. I don't know how much they</p> <p>7 had contact.</p> <p>8 -- whom O'Hara hired on behalf for an</p> <p>9 entirely legal investigation.</p> <p>10 Yes, I've seen a paper that said that Aviv</p> <p>11 would not do anything illegal.</p> <p>12 "We knew nothing here about a sting."</p> <p>13 I don't believe that's true.</p> <p>14 Joe O'Hara from the very beginning spoke of</p> <p>15 things like that. I don't know what you'd call a</p> <p>16 sting or not, but what I did know was that it was</p> <p>17 alleged by people that have spoken to Ross that</p> <p>18 Ross was saying things that were outrageous about</p> <p>19 NXIVM, about myself and that Joe thought it would be</p> <p>20 good to catch him doing that with someone so that it</p> <p>21 could be documented.</p> <p>22 He stated, "We had no participation in any</p> <p>23 sting."</p> <p>24 I don't know if that's true or false.</p> <p>25 If you -- if you say Kristin knowing about</p>
<p style="text-align: right;">Page 298</p> <p>1 know is that a -- is that a quote from him? I can't</p> <p>2 see the quotes.</p> <p>3 Q. I read the quotes into the record.</p> <p>4 A. Okay. That's --</p> <p>5 Q. Some of it is a quote --</p> <p>6 A. Okay.</p> <p>7 Q. And some of it is the author.</p> <p>8 A. Okay.</p> <p>9 Q. What parts have true to it -- truth to them?</p> <p>10 A. I'm going to try to read it with my</p> <p>11 binoculars.</p> <p>12 Q. Go ahead.</p> <p>13 A. Starting with, "Robertson says" --</p> <p>14 Q. Yeah.</p> <p>15 A. -- "that NXIVM." Okay.</p> <p>16 Q. My next series of questions will relate to</p> <p>17 the following paragraph, so you might as well read</p> <p>18 two paragraphs.</p> <p>19 A. In other words, that and the paragraph that</p> <p>20 says when?</p> <p>21 Q. Yeah, it starts "when" and then jumps over</p> <p>22 the picture.</p> <p>23 A. Okay. Can I take it sentence by sentence?</p> <p>24 Q. Uh-huh.</p> <p>25 A. It says, "Robertson says that NXIVM was</p>	<p style="text-align: right;">Page 300</p> <p>1 the sting or my hearing about the sting is</p> <p>2 participation, then we did, because I did know about</p> <p>3 it. I don't know if I knew about it after or</p> <p>4 before. From what I've read, it sounds like Kristin</p> <p>5 knew before and was more intimately involved so...</p> <p>6 "We found out about it afterward. What we</p> <p>7 saw was, a corrupt attorney," I believe true, "hires</p> <p>8 a corrupt private investigator."</p> <p>9 I don't know. From what I read in the</p> <p>10 contract, if Juval has done nothing illegal, then</p> <p>11 that contract is valid. If he's done something</p> <p>12 illegal, the contract's invalid. I don't know if</p> <p>13 he's corrupt or not.</p> <p>14 "We certainly didn't -- and would not --</p> <p>15 authorize illegal activities."</p> <p>16 That's true.</p> <p>17 "That was his doing, and I understand that's</p> <p>18 his nature."</p> <p>19 That's his opinion.</p> <p>20 "He's pretty much a loose cannon."</p> <p>21 That's his opinion. If this is Frank Parlato</p> <p>22 speaking for NXIVM, that's what my opinion is on</p> <p>23 what I've read so far.</p> <p>24 Want me to continue?</p> <p>25 Q. Why don't you -- let me just pause for a</p>

<p style="text-align: right;">Page 301</p> <p>1 moment.</p> <p>2 You just testified if that's Frank Parlato</p> <p>3 speaking --</p> <p>4 MR. LANDY: Reread the last half of the</p> <p>5 answer, please, so I can get the quote proper.</p> <p>6 "If this is Frank Parlato speaking" is</p> <p>7 where you need to start unless you all want to hear</p> <p>8 the whole answer.</p> <p>9 (The following was read back by the</p> <p>10 reporter:</p> <p>11 "If this is Frank Parlato speaking for</p> <p>12 NXIVM, that's what my opinion is on what I've read</p> <p>13 so far.</p> <p>14 Want me to continue?")</p> <p>15 Q. Can you just explain that answer? What's</p> <p>16 your opinion? Are you saying that whatever --</p> <p>17 A. Each sentence that I read --</p> <p>18 Q. Yeah.</p> <p>19 A. Right. I don't know if this is Frank</p> <p>20 Parlato, although I have reason to believe it is,</p> <p>21 considering, and I took each sentence and responded</p> <p>22 to it from my perspective.</p> <p>23 Q. Okay. So what you're not saying is that if</p> <p>24 this is on behalf of NXIVM, then it is also your</p> <p>25 opinion?</p>	<p style="text-align: right;">Page 303</p> <p>1 the same manner?</p> <p>2 A. Yes.</p> <p>3 "When asked if he regretted hiring Aviv" --</p> <p>4 am I reading that right that --</p> <p>5 Q. Yeah, you want me to read it out --</p> <p>6 A. -- "Robertson replied, 'How can you not</p> <p>7 regret hiring the guy who would pad his own hours,</p> <p>8 he'd fabricate, he'd create stories that he couldn't</p> <p>9 document, and behind your back he creates fantastic</p> <p>10 programs like, uh, we later found out he was going</p> <p>11 to do some kind of insane sting kind of deal."</p> <p>12 To comment on that, what I told you might</p> <p>13 fit into this with if the astro projection thing is</p> <p>14 true, that that could clearly be a fabrication and</p> <p>15 something that's very difficult to verify. As far</p> <p>16 as I know, such things have never been verified in</p> <p>17 science.</p> <p>18 -- "insane sting kind of deal."</p> <p>19 I may not know the full description of what</p> <p>20 an insane sting type of deal is. What I understood</p> <p>21 did not sound particularly insane.</p> <p>22 From what I understood, Juval represented he</p> <p>23 had a previous relationship with Ross. Juval said</p> <p>24 that he did not want to work with Ross because Ross</p> <p>25 asked him to fabricate evidence -- I don't know if</p>
<p style="text-align: right;">Page 302</p> <p>1 A. Correct.</p> <p>2 Q. Okay. That's -- that's all I wanted to</p> <p>3 clarify.</p> <p>4 MR. SKOLNIK: I'm sorry. Could I hear</p> <p>5 the last question?</p> <p>6 (The following was read back by the</p> <p>7 reporter:</p> <p>8 "Okay. So what you're not saying is</p> <p>9 that if this is on behalf of NXIVM, then it is also</p> <p>10 your opinion?</p> <p>11 ANSWER: Correct.")</p> <p>12 BY MR. LANDY:</p> <p>13 Q. So let's move on to the next paragraph then,</p> <p>14 or let me stop you for a second and let's just go</p> <p>15 over a couple of quick things that you said.</p> <p>16 You said you've seen a paper where it was</p> <p>17 written that Interfor would not do anything illegal,</p> <p>18 is that correct?</p> <p>19 A. Yes. I saw contract terms supposedly between</p> <p>20 Interfor and NXIVM.</p> <p>21 Q. Where did you see that?</p> <p>22 A. At Nancy's house.</p> <p>23 Q. All right. Let's move on to the next -- also</p> <p>24 -- yeah, let's move on.</p> <p>25 So can we go through the next paragraph in</p>	<p style="text-align: right;">Page 304</p> <p>1 that's true or not -- and that supposedly Juval said</p> <p>2 he understood Ross' motives, so I don't know what</p> <p>3 they concocted.</p> <p>4 He says, "We're certainly not responsible,</p> <p>5 nor do we condone this type of activity."</p> <p>6 I don't know what "this type of activity" is.</p> <p>7 "Aviv did it, there seems to be no doubt.</p> <p>8 How he did, I don't know." I don't know what it</p> <p>9 is, what the sting thing is in completion.</p> <p>10 "I heard that he was rummaging through</p> <p>11 garbage."</p> <p>12 I -- I've heard that, too. I don't know if</p> <p>13 it -- I don't think it was Aviv that was rummaging</p> <p>14 through garbage from what I imagine.</p> <p>15 Q. You earlier testified that Mr. O'Hara --</p> <p>16 A. Am I going to need to re --</p> <p>17 Q. Keep it out. I don't think so but --</p> <p>18 A. Okay, I'll just.</p> <p>19 Q. If you could switch glasses.</p> <p>20 A. Yeah.</p> <p>21 Q. You previously testified that Mr. O'Hara had</p> <p>22 suggested catching Ross in the act.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Can you expand on that? What did -- what did</p> <p>25 Mr. O'Hara suggest?</p>

<p style="text-align: right;">Page 305</p> <p>1 A. O'Hara and I and I think O'Hara and NXIVM 2 have a fundamental disagreement in philosophy, which 3 was always a problem. O'Hara when we first met 4 O'Hara suggested doing things that were let's just 5 say in a -- what you might call inappropriate. He 6 was not specific, but when I spoke to him and I 7 responded to what he said, he said, "Well, okay. 8 You don't believe in that sort of a thing." 9 He -- he believes he has stated to me that if 10 someone breaks the rules, then you can do anything. 11 I have stated back to him, "Who is to judge that?" 12 First of all, so that leaves you with a problem. I 13 -- I thought I heard -- so I'm sorry. 14 MR. CAMPION: If you finished the 15 answer, you finished the answer. If you have more 16 to say, say it. 17 Q. I'm just -- you were pausing. 18 A. Yeah, okay. 19 Q. I don't know that that quite -- 20 MR. LANDY: Can you read my question 21 back, please. 22 (The following was read back by the 23 reporter: 24 "Can you expand on that? What did -- 25 what did</p>	<p style="text-align: right;">Page 307</p> <p>1 Q. Yes. 2 A. No. I didn't really know about it. I knew 3 it existed. I never read it. 4 Q. Did you ever discuss it with Ms. Keefe? 5 A. No. I knew it existed. I've never read it. 6 Q. Do you know who Chris Thompson is? 7 A. No. 8 Q. At any point, did you become aware that 9 Interfor was beginning an investigation of 10 Rick Ross? 11 A. I wasn't aware that they were beginning. I 12 was aware that they had already investigated. 13 Q. When did you become aware of that? 14 A. When I met Juval at Nancy's house. 15 Q. Had you learned about any of the results of 16 Interfor's investigations prior to your meeting with 17 Mr. Aviv? 18 A. No. No. I was contemplating. I had heard 19 from Kristin Keefe at one point that Juval had a 20 bunch of information that she thought he had gotten 21 off the internet, and I'm quite sure that was after 22 but I'm not positive. 23 Q. After your meeting? 24 A. Or right in the proximity. It was close in 25 proximity.</p>
<p style="text-align: right;">Page 306</p> <p>1 Mr. O'Hara suggest?") 2 Q. Right, and then I believe you discussed your 3 difference of opinion but -- 4 A. Inappropriate. 5 Q. -- did he suggest anything specific? 6 A. Well, he always suggested trying to observe 7 or document Ross' wrongdoings, which I think is 8 appropriate. 9 Q. Did he suggest how you should do that? 10 A. He suggested many ways. With respect to this 11 issue, I think he wanted to get Ross documented 12 saying the slanderous things that were alleged that 13 Ross was saying. 14 Q. Did he say how he would get -- he wanted to 15 get that documented? 16 A. No. 17 Q. When did you have this conversation? 18 A. Years ago. I had ongoing conversations with 19 Joe O'Hara. 20 Q. You can put the article aside. 21 Let me ask you a couple more questions. You 22 won't have to actually refer to it, though. 23 Did you ever discuss this article with 24 Ms. Salzman? 25 A. Discuss this article?</p>	<p style="text-align: right;">Page 308</p> <p>1 Q. Do you know if anyone at NXIVM asked Interfor 2 to investigate Rick Ross? 3 A. No. 4 Q. Did you ever discuss Interfor's investigation 5 of Rick Ross with anyone at NXIVM? 6 A. Superficially, yes, with Kristin, as I 7 mentioned. I've seen some of the documents in this 8 case which discuss it; not in detail, though. 9 Q. We discussed earlier or you testified earlier 10 that you had had some conversations with Mr. O'Hara 11 and someone from the Nolan & Heller firm about 12 hiring a private investigator. 13 Did you discuss hiring a private investigator 14 with anybody else? 15 A. I don't know if I had discussions about 16 hiring the private investigator with Nolan & Heller. 17 I gave my advice on how to select potentially a 18 private investigator. On and off there have been 19 discussions of hiring private investigators. 20 Q. And let me rephrase the -- I should have 21 restricted that question to the year of 2004. 22 A. Okay. I don't remember what discussions 23 happened in that year. 24 Q. In the time frame of 2004 and 2005, were you 25 made aware of an operation whereby Interfor would</p>

<p style="text-align: right;">Page 309</p> <p>1 approach Mr. Ross and speak to him on behalf of a 2 fictitious client? 3 A. I became aware that that had happened. I 4 don't know when. 5 Q. When did -- under what circumstances did you 6 become aware that that had happened? 7 A. I think it was Joe. Joe mentioned I believe 8 that Juval had Rick Ross on tape saying he had 9 compromising pictures of me and things like in the 10 shower, something like that, and having sex with 11 many students and such things. 12 Q. Have you ever heard the tape? 13 A. No. 14 Q. Did Mr. O'Hara make any comment as to whether 15 he was pleased with the results of that -- the 16 meeting between Mr. Ross and Mr. Aviv? 17 A. No. 18 Q. Did you discuss at that point discontinuing 19 NXIVM's relationship with Interfor? 20 A. After my meeting with Juval that night at 21 Nancy's, it was my position that Juval did not -- 22 did not function in a way that would be helpful to 23 us. 24 Q. What do you mean by that? 25 A. I -- I did not find Juval to be credible to</p>	<p style="text-align: right;">Page 311</p> <p>1 pretty positive or whatever, but often with Joe 2 things did not get done so I was always wondering 3 if he was just humoring me because I'm either a 4 friend or someone who's seen as important to some 5 degree or whatever so... 6 Q. Did Ms. Salzman have any reaction when you 7 discussed this with her? 8 A. I think, yeah, Nancy takes what I say pretty 9 seriously; and I suspect she went and investigated 10 what was going on. I don't know for sure. 11 Q. Did she say anything to you? 12 A. Not directly, but the sort of things I would 13 advise in a certain circumstance like this are, 14 "What are you paying for? What are you getting as 15 a take-away product? What are you getting as an end 16 product? If you're putting money in, is it really 17 worth that money, what you're getting out the other 18 side? Are you getting just talk, or are you getting 19 specific results? Is it appropriate? Do you 20 believe in the person?" Those sort of things. 21 My impression from my memory of talking with 22 Nancy is that Nancy felt that Juval was not giving 23 results, and I don't know if that's with respect to 24 Ross because at the time the main concern was if 25 there really was some sort of money funded</p>
<p style="text-align: right;">Page 310</p> <p>1 me. He was talking a lot about himself. He was 2 talking a lot about his past; and when someone 3 advertises that much to me, I find them less 4 credible. So it was my position -- it sounded like 5 an awful lot of effort for things like, you know, 6 this -- the thing that I had heard, the astro 7 projection sort of stuff or whatever. And when 8 Juval spoke, it didn't sound very definite. It was 9 all very nebulous. 10 Q. Who did you discuss this with? 11 A. Which thing? 12 Q. What you just testified to, your opinion. 13 A. There were times when Joe -- I would mention 14 it to Joe. I'm sure I've mentioned it to Nancy, and 15 I certainly mentioned it to Kristin. 16 Q. Okay. Let me start with Joe. I presume 17 we're discussing Mr. O'Hara. 18 MR. SKOLNIK: Bob, I'm having trouble 19 hearing your questions. 20 MR. LANDY: Sorry. 21 A. Joe, I'm sorry. 22 Q. Yeah. We're discussing Mr. O'Hara. Did he 23 have any reaction to your position? 24 A. Joe was very friendly to me so he always took 25 my positions and seemed to agree, seemed to be</p>	<p style="text-align: right;">Page 312</p> <p>1 politically behind outside of us so that there would 2 be negative press, there would be negative politics, 3 things like that. 4 Q. How did Ms. Keeffe react to what you told 5 her? 6 A. She's more combative and -- which is fine. I 7 think it's her -- her personality. I think also she 8 was friends with Juval Aviv and upheld him often as 9 being valuable or that he really does seem credible, 10 and she thinks he's genuine and things like that. 11 Q. Do you know if there came a time when NXIVM 12 ended its relationship with Interfor? 13 A. I assume so. 14 Q. You don't know one way or the other? 15 A. No, and I don't know when if that happened. 16 Q. My next question was going to be why, not 17 when. 18 A. Oh. 19 Q. Do you know why? 20 A. No. 21 Q. I'm going to show you a document that was 22 also previously marked. This was marked as NXIVM 23 Exhibit 9. It bears the -- it bears two sets of 24 Bates numbers. It bears the Bates numbers SP0554 25 through 555 as well as JJO-000699 through 700.</p>

<p style="text-align: right;">Page 313</p> <p>1 I'd ask you to review that document.</p> <p>2 A. (Witness complies.)</p> <p>3 MR. SKOLNIK: What's the number on this?</p> <p>4 MR. LANDY: This is previously marked</p> <p>5 NXIVM-9. It's got the sticker on it.</p> <p>6 BY MR. LANDY:</p> <p>7 Q. And when you're done going through this,</p> <p>8 Mr. Raniere, my first question is going to be</p> <p>9 whether or not you recognize the document.</p> <p>10 A. I don't believe this document to be true.</p> <p>11 Q. We can get to that, but the first question is</p> <p>12 whether you recognize it.</p> <p>13 A. No. I recognize from it looking through the</p> <p>14 documents in this case.</p> <p>15 Q. Do you recall ever receiving this document?</p> <p>16 A. No. This document says "Hand Delivered" on</p> <p>17 the top.</p> <p>18 If you understood my lifestyle, as certainly</p> <p>19 Joe did, the only way he could hand deliver it would</p> <p>20 be to hand me this document. I have never seen this</p> <p>21 document.</p> <p>22 Q. I direct your attention to -- one, two -- the</p> <p>23 third full paragraph on the first page. There's a</p> <p>24 -- the second sentence is in -- is underlined and in</p> <p>25 parentheses and reads, "(Note: This specifically</p>	<p style="text-align: right;">Page 315</p> <p>1 Interfor's investigations in the future discussed?</p> <p>2 A. Not specifically. Juval Aviv spoke of many</p> <p>3 things that he could do for NXIVM in a very broad</p> <p>4 sense. It was more of a social dinner.</p> <p>5 Q. Did you discuss Mr. Ross' -- strike that.</p> <p>6 Did you discuss Mr. Aviv's meeting with</p> <p>7 Mr. Ross during what you said was that dinner?</p> <p>8 A. No. I don't know even if the meeting had</p> <p>9 occurred or not. He did mention I believe in that</p> <p>10 meeting also that he had a preexisting relationship</p> <p>11 with Ross.</p> <p>12 "I know him." I think he said something</p> <p>13 along those lines.</p> <p>14 Q. Is this the meeting at which you learned</p> <p>15 about the claim that Mr. Ross had I think you</p> <p>16 described photographs of you?</p> <p>17 A. No.</p> <p>18 Q. When did you hear about that?</p> <p>19 A. I think it was sometime after.</p> <p>20 Q. Who did you hear it from?</p> <p>21 A. I believe I heard it from Kristin Keeffe.</p> <p>22 Q. Did you ever hear of a plan whereby Interfor</p> <p>23 would arrange that Mr. Ross meet Ms. Keeffe at</p> <p>24 either a resort or on a cruise with Ms. Keeffe using</p> <p>25 an assumed name?</p>
<p style="text-align: right;">Page 314</p> <p>1 includes, but is not limited to, the 'Sting</p> <p>2 Operation' that Keith has proposed Interfor</p> <p>3 undertake with" -- sorry -- "that Keith has proposed</p> <p>4 having Interfor undertake with respect to Mr.</p> <p>5 Ross)."</p> <p>6 Q. Did you propose having Interfor undertake</p> <p>7 any actions with respect to Mr. Ross?</p> <p>8 A. No.</p> <p>9 Q. Turn to the next page.</p> <p>10 A. (Witness complies.)</p> <p>11 Q. Who is Matthew Jones?</p> <p>12 A. He's an attorney in Saratoga that is a friend</p> <p>13 of Joe -- Joe O'Hara and a close friend of his</p> <p>14 partner, Doug Rutnik.</p> <p>15 Q. Does Mr. Jones -- has Mr. Jones ever</p> <p>16 represented NXIVM?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. Has he ever represented you?</p> <p>19 A. I don't know if it -- I don't believe so.</p> <p>20 Q. Was Mr. O'Hara ever your attorney?</p> <p>21 A. I believe so, yes.</p> <p>22 Q. I'd like to return to your meeting with</p> <p>23 Mr. Aviv.</p> <p>24 At that meeting or that meeting at</p> <p>25 Ms. Salzman's house was -- were any plans for</p>	<p style="text-align: right;">Page 316</p> <p>1 A. I've seen it in this paperwork, and I believe</p> <p>2 I heard it before I saw it in the paperwork here.</p> <p>3 Q. Who did you hear it from?</p> <p>4 A. I believe I heard it from Kristin.</p> <p>5 Q. Do you know when you dis -- when you heard it</p> <p>6 from Kristin?</p> <p>7 A. And what I heard from Kristin was not</p> <p>8 necessarily that she was to meet or whatever. I</p> <p>9 heard it in the context that -- I don't remember --</p> <p>10 whoever it was claimed that there was something to</p> <p>11 do with a cruise ship or she found the cruise ship</p> <p>12 thing apparently ridiculous -- I don't know -- and</p> <p>13 if I remember correctly, she found it to be an</p> <p>14 exaggeration.</p> <p>15 Q. An exaggeration of what?</p> <p>16 A. It sounds like there was some planned thing</p> <p>17 where they were going to get information that Ross</p> <p>18 was telling people, and I don't know if it was from</p> <p>19 -- with Kristin, per se, but I do believe I did hear</p> <p>20 this from Kristin.</p> <p>21 Q. Do you know when you heard it from Kristin?</p> <p>22 A. No, not specifically.</p> <p>23 Q. Do you know whether Kristin was supposed to</p> <p>24 be involved in this plan?</p> <p>25 A. When you say "involved" --</p>

<p style="text-align: right;">Page 317</p> <p>1 Q. A participant.</p> <p>2 A. Oh, that I don't know so...</p> <p>3 Q. Then the second question is whether she was</p> <p>4 involved in the planning of what we can refer to as</p> <p>5 a sting.</p> <p>6 A. That I don't know. She might have been.</p> <p>7 Q. Did you ever -- I'm going to refer to that</p> <p>8 meeting -- to this plan of meeting Rick Ross on a</p> <p>9 cruise ship that's somewhat undefined as "the sting"</p> <p>10 just for ease of --</p> <p>11 A. Can you exclude the cruise ship? Just say</p> <p>12 some meeting with Rick --</p> <p>13 Q. Some meeting with Rick Ross somewhere --</p> <p>14 A. Right.</p> <p>15 Q. -- with -- well, I have to -- give me a</p> <p>16 second to rephrase that.</p> <p>17 Are you aware that Mr. Ross, in fact, met</p> <p>18 with Mr. Aviv and one -- and an employee of Interfor</p> <p>19 at some point?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Are you aware that there was a planned</p> <p>22 second stage of this operation whereby Mr. Ross was</p> <p>23 supposed to meet with someone else who would be an</p> <p>24 employee or a member or a student of NXIVM?</p> <p>25 A. I'm aware of that now.</p>	<p style="text-align: right;">Page 319</p> <p>1 objection to you to the actions of --</p> <p>2 A. No, not that I remember.</p> <p>3 Q. Hold on. You got to let me finish the</p> <p>4 question and then --</p> <p>5 A. I haven't heard an objection to that, so I</p> <p>6 was going to answer.</p> <p>7 Q. I know that. I'm just -- for the transcript,</p> <p>8 I got to finish the question and then you give me</p> <p>9 the answer or else you got these dashes and then it</p> <p>10 becomes completely muddled.</p> <p>11 The question is did Ms. Keeffe ever express</p> <p>12 to you any objection concerning Interfor's meeting</p> <p>13 with Rick Ross?</p> <p>14 A. No, not that I'm aware.</p> <p>15 Q. When was the first time you saw NXIVM Exhibit</p> <p>16 9?</p> <p>17 A. I think when I looked through the papers</p> <p>18 given me for this deposition.</p> <p>19 Q. Now, correct me if I'm mischaracterizing your</p> <p>20 earlier testimony, but is it your understanding that</p> <p>21 Joseph O'Hara and Nolan & Heller were -- believed</p> <p>22 that they had obtained the information that they</p> <p>23 were seeking after Mr. Ross' first meeting with</p> <p>24 Juval Aviv? Because you said "they."</p> <p>25 A. Yeah. I don't know if it was after the first</p>
<p style="text-align: right;">Page 318</p> <p>1 Q. When did you become aware of that?</p> <p>2 A. Reading the paperwork. It was my impression</p> <p>3 that whatever information they wanted they had</p> <p>4 gotten in this tape.</p> <p>5 Q. When you say "they," who are you referring</p> <p>6 to?</p> <p>7 A. Joe O'Hara, Interfor and that group, Nolan &</p> <p>8 Heller. I don't know how they're involved in there.</p> <p>9 Q. Did anyone at NXIVM ever express to you an</p> <p>10 objection to the fact that Ross had or that Mr. Aviv</p> <p>11 had met with Mr. Ross?</p> <p>12 A. 'Cause I've read the things in this case, I</p> <p>13 mean --</p> <p>14 Q. Well, the question is did anyone ever express</p> <p>15 to you an objection?</p> <p>16 A. An objection. Not that I recall.</p> <p>17 Q. Did Ms. Salzman ever discuss -- ever mention</p> <p>18 any objection to the actions that Mr. Aviv had taken</p> <p>19 in meeting Mr. Ross when you had a discussion with</p> <p>20 her about the continuing use of Interfor's</p> <p>21 services --</p> <p>22 A. No.</p> <p>23 Q. -- that we discussed about earlier?</p> <p>24 A. No, not that I remember.</p> <p>25 Q. Okay. Did Ms. Keeffe ever express an</p>	<p style="text-align: right;">Page 320</p> <p>1 meeting, and I don't know exactly the whys and</p> <p>2 wherefores, but what it sounded like was that</p> <p>3 whatever this tape was damning and that that</p> <p>4 was good.</p> <p>5 Q. Did you ever -- do you know if Ms. Keeffe</p> <p>6 held the same opinion?</p> <p>7 A. No, I don't know.</p> <p>8 Q. Did anyone actually tell you that the tape</p> <p>9 was damning and that that was good? Not in those</p> <p>10 specific words.</p> <p>11 A. Yeah. I imagine Kristin saying some of the</p> <p>12 details that I mentioned to you and in a very</p> <p>13 emphatic sense said, "this, this, this." I think</p> <p>14 it's my -- my opinion that it was, if you will,</p> <p>15 complete, good, whatever, that that was captured.</p> <p>16 MR. LANDY: Could I just have the last</p> <p>17 answer read back.</p> <p>18 (The following was read back by the</p> <p>19 reporter:</p> <p>20 "Yeah. I imagine Kristin saying some of</p> <p>21 the details that I mentioned to you and in a very</p> <p>22 emphatic sense said, 'this, this, this.' I think</p> <p>23 it's my -- my opinion that it was, if you will,</p> <p>24 complete, good, whatever, that that was captured.")</p> <p>25</p>

<p style="text-align: right;">Page 321</p> <p>1 BY MR. LANDY:</p> <p>2 Q. What do you mean by in your opinion?</p> <p>3 A. In other words, Kristin would say, you know,</p> <p>4 "Oh, this, this and this." And, you know, I had</p> <p>5 heard for a long time -- we have different people</p> <p>6 who have heard this from Ross and that from Ross,</p> <p>7 and it's a lot of hearsay.</p> <p>8 If it is indeed something that's legitimately</p> <p>9 documented, that's better. That's more reliable</p> <p>10 data. You know, no matter how much I might think</p> <p>11 Ross is an opponent, there's opinion and there's</p> <p>12 data, and there's a lot of hearsay.</p> <p>13 MR. McGUIRE: Mr. Landy, if such a tape</p> <p>14 exists, would you produce it, please?</p> <p>15 MR. LANDY: It was produced --</p> <p>16 MR. McGUIRE: It was?</p> <p>17 MR. LANDY: -- bearing Bates numbers</p> <p>18 Interfor 00001. I have a segment with me today as</p> <p>19 well as an unofficial transcript of it --</p> <p>20 MR. McGUIRE: All right. Thank you.</p> <p>21 MR. LANDY: But we'll get to that.</p> <p>22 I might have messed up the number of</p> <p>23 zeroes, but I think it was four of them.</p> <p>24 I'm sorry. Now I have to hear the last</p> <p>25 answer once more.</p>	<p style="text-align: right;">Page 323</p> <p>1 A. The trade secret materials?</p> <p>2 Q. No, no, no. Sorry. Taking a broader sense to</p> <p>3 shorten the conversation, that actually had the</p> <p>4 materials that Ms. Keeffe had described to you?</p> <p>5 A. Like the pictures and all that?</p> <p>6 Q. Yes.</p> <p>7 A. No, I have no knowledge of that.</p> <p>8 Q. So you would have no knowledge of where he</p> <p>9 got it?</p> <p>10 A. Correct.</p> <p>11 Q. Did any of the --</p> <p>12 A. I don't believe they exist.</p> <p>13 Q. My next question was did any of the things</p> <p>14 that Ms. Keeffe described to you seem to be things</p> <p>15 you knew actually existed?</p> <p>16 MR. McGUIRE: Let me have that read</p> <p>17 back, please.</p> <p>18 (The following was read back by the</p> <p>19 reporter:</p> <p>20 "My next question was did any of the</p> <p>21 things that Ms. Keeffe described to you seem to be</p> <p>22 things you knew actually existed?")</p> <p>23 A. No.</p> <p>24 MR. LANDY: All right. Now, I actually</p> <p>25 have to mark something.</p>
<p style="text-align: right;">Page 322</p> <p>1 (The following was read back by the</p> <p>2 reporter:</p> <p>3 "In other words, Kristin would say, you</p> <p>4 know, 'Oh, this, this and this.' And, you know, I</p> <p>5 had heard for a long time -- we have different</p> <p>6 people who have heard this from Ross and that from</p> <p>7 Ross, and it's a lot of hearsay. If it is indeed</p> <p>8 something that's legitimately documented, that's</p> <p>9 better. That's more reliable data. You know, no</p> <p>10 matter how much I might think Ross is an opponent,</p> <p>11 there's opinion and there's data, and there's a lot</p> <p>12 of hearsay.")</p> <p>13 BY MR. LANDY:</p> <p>14 Q. Were you pleased with what Ms. Keeffe told</p> <p>15 you that Interfor was able to capture?</p> <p>16 A. I haven't seen the transcript of the tape, so</p> <p>17 I don't know. I mean, what she was saying sounded</p> <p>18 pretty wild.</p> <p>19 Q. Do you have an understanding of where</p> <p>20 Mr. Ross purportedly received the material that he</p> <p>21 purported -- start that again.</p> <p>22 Do you know whether or not Mr. Ross, in fact,</p> <p>23 had the materials he claimed to have?</p> <p>24 A. Mr. Ross had what materials?</p> <p>25 Q. That we've been discussing, the mis --</p>	<p style="text-align: right;">Page 324</p> <p>1 What are we up to?</p> <p>2 THE REPORTER: Raniere-16.</p> <p>3 MR. LANDY: Okay. I'd ask the court</p> <p>4 reporter to mark as Raniere-16 a document entitled</p> <p>5 Keith Raniere's Responses to Defendant Rick Ross'</p> <p>6 First Amended Set of Interrogatories to NXIVM</p> <p>7 Corporation; another mouthful.</p> <p>8 (Keith Raniere's Responses to Defendant</p> <p>9 Rick Ross' First Amended Set of Interrogatories</p> <p>10 to NXIVM Corporation was received and marked</p> <p>11 Defendant's Exhibit Raniere-16 for Identification.)</p> <p>12 (A discussion was held off the record.)</p> <p>13 BY MR. LANDY:</p> <p>14 Q. Do you recognize this document, sir?</p> <p>15 A. Yes, I believe I do.</p> <p>16 Q. On the second-to-last page, which is Page</p> <p>17 Number 13, is that your signature?</p> <p>18 A. Yes. I am curious -- okay. I misread</p> <p>19 something where it said March 1, 2007, in the front.</p> <p>20 Yeah, I have one set of things that I signed</p> <p>21 February 1st but not March.</p> <p>22 Q. All right. If you turn to Page 6, I'm going</p> <p>23 to direct you to the third paragraph of the response</p> <p>24 to Interrogatory Number 1.</p> <p>25 A. 6?</p>

<p style="text-align: right;">Page 325</p> <p>1 Q. Page 6.</p> <p>2 A. Mr. Ran -- it starts, "Mr. Raniere does</p> <p>3 recall some"?</p> <p>4 Q. It starts, "Mr. Raniere does recall."</p> <p>5 A. Uh-huh.</p> <p>6 Q. I'll just read it for the record.</p> <p>7 "Mr. Raniere does recall some communications</p> <p>8 with Kristin Keeffe where the subject matter</p> <p>9 generally involved a revelation that came to light</p> <p>10 because of Interfor's work that Rick Ross claimed to</p> <p>11 falsely possess material of a very personal nature</p> <p>12 Mr. Raniere deemed inappropriate and in violation of</p> <p>13 his right to privacy with which, he was informed, it</p> <p>14 was Rick Ross' stated intention to coerce NXIVM."</p> <p>15 Are those materials of a very personal nature</p> <p>16 what we've just been discussing?</p> <p>17 A. Uh-huh.</p> <p>18 Q. Say "yes" or "no."</p> <p>19 A. Yes.</p> <p>20 Q. Okay, but you believe the -- isn't it --</p> <p>21 start it again.</p> <p>22 Is it true that you believe the materials</p> <p>23 that Mr. Ross claimed to have don't really exist?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. Can you explain how it is a -- what</p>	<p style="text-align: right;">Page 327</p> <p>1 Q. The whole --</p> <p>2 A. The full paragraph?</p> <p>3 Q. Read the full paragraph.</p> <p>4 A. (Witness complies.)</p> <p>5 Yes.</p> <p>6 Q. All right. Do you see on the -- on Page 10</p> <p>7 where it says, "The details of the alleged 'plan'</p> <p>8 were attended to by others, and Mr. Raniere only</p> <p>9 learned of them subsequent to Interfor's attempted</p> <p>10 implementation."</p> <p>11 A. Yes.</p> <p>12 Q. Who were the others you were referring to?</p> <p>13 A. Joe O'Hara, I guess Nolan & Heller if they</p> <p>14 were involved, possibly Kristin. I mean, I believe</p> <p>15 she knew.</p> <p>16 Q. I turn your attention to Page 11, which is</p> <p>17 the response to Interrogatory Number 10.</p> <p>18 Again, the paragraph starts with, "Without</p> <p>19 waiving the foregoing objection," but if you would</p> <p>20 read that paragraph to yourself, and then I'll have</p> <p>21 a quick one or two questions about it as well.</p> <p>22 A. (Witness complies.)</p> <p>23 MR. McGUIRE: Interrogatory 11?</p> <p>24 MR. LANDY: No. Response to 10, Page</p> <p>25 11.</p>
<p style="text-align: right;">Page 326</p> <p>1 did you mean by it was a violation of -- I'm</p> <p>2 paraphrasing -- your right to privacy?</p> <p>3 A. Uh-huh. If such materials do exist, it's</p> <p>4 either there is a type of exaggerated hearsay going</p> <p>5 on or there is slander or there is an invasion of</p> <p>6 privacy. So it's my position -- and I have never</p> <p>7 seen these things -- if these things exist, they are</p> <p>8 a violation of my privacy. It's hard to imagine</p> <p>9 they do.</p> <p>10 Q. Is it your position that they violate your --</p> <p>11 strike that question.</p> <p>12 I'd like to direct your attention to your</p> <p>13 response to Interrogatory Number 8, which is the</p> <p>14 paragraph that begins on Page 9 and continues on to</p> <p>15 Page 10.</p> <p>16 A. Uh-huh.</p> <p>17 Q. It starts with, "Without waiving these</p> <p>18 objections" --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- but most of the paragraphs start that way.</p> <p>21 A. Uh-huh.</p> <p>22 Q. Just read that to yourself and then I'll ask</p> <p>23 you a quick question or two.</p> <p>24 A. The first line of the paragraph or</p> <p>25 continuing?</p>	<p style="text-align: right;">Page 328</p> <p>1 MR. McGUIRE: I'm sorry.</p> <p>2 (A discussion was held off the record.)</p> <p>3 A. Uh-huh.</p> <p>4 Q. On Page 11, one, two three, four -- five</p> <p>5 lines down in the sentence that starts with the --</p> <p>6 the last word of that sentence --</p> <p>7 A. At?</p> <p>8 Q. -- reads: "At some point during the course</p> <p>9 of this litigation Mr. Raniere became aware of a</p> <p>10 written communication from Interfor entitled 'Status</p> <p>11 Report' that was a report on the status of an</p> <p>12 investigation into Rick Ross."</p> <p>13 When during this litigation did you become</p> <p>14 aware of the Status Report?</p> <p>15 A. I'm not exactly sure, but I'm trying to</p> <p>16 remember if it was before or after the</p> <p>17 counterclaims. I think it was before the</p> <p>18 counterclaims were filed.</p> <p>19 Q. By Mr. Ross? The counterclaims by Mr. Ross?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Did you see it?</p> <p>22 A. I'm not positive. No.</p> <p>23 Q. Who did you hear about it from?</p> <p>24 A. I believe I heard about it from Kristin.</p> <p>25 Q. All right. You can put Raniere-16 aside.</p>

<p style="text-align: right;">Page 329</p> <p>1 Who is Toni Natalie?</p> <p>2 A. Toni Natalie is a -- an ex-business associate</p> <p>3 of mine, someone who was involved with Consumers'</p> <p>4 Buyline, someone that I was very involved with</p> <p>5 personally.</p> <p>6 Q. By "personally," do you mean romantically?</p> <p>7 MR. CAMPION: None of that.</p> <p>8 Are you going to press that point.</p> <p>9 MR. LANDY: Let me take a look and see</p> <p>10 if I can get around it.</p> <p>11 Let's go off the record for one second.</p> <p>12 Can we chat for a second?</p> <p>13 MR. CAMPION: Sure.</p> <p>14 THE VIDEOGRAPHER: Going off the record</p> <p>15 at 2:45.</p> <p>16 (At this point, there was a short</p> <p>17 recess.)</p> <p>18 THE VIDEOGRAPHER: This is the beginning</p> <p>19 of Tape Number 5. The time is 3:08.</p> <p>20 BY MR. LANDY:</p> <p>21 Q. At this point, Mr. Raniere, I'd like to mark</p> <p>22 an excerpt from an audio recording. I'll represent</p> <p>23 to you that this audio recording was produced in</p> <p>24 discovery in this action. It bears the Bates</p> <p>25 Numbers Interfor 00001, and what I'm going to --</p>	<p style="text-align: right;">Page 331</p> <p>1 over the entire excerpt. What we'll do is I'll</p> <p>2 read a portion, and then I'll ask you a question;</p> <p>3 and then I'll read a portion, and then I'll ask you</p> <p>4 a question.</p> <p>5 MR. SKOLNIK: Bob, could you keep your</p> <p>6 voice up?</p> <p>7 MR. LANDY: Yeah, sure.</p> <p>8 MR. SKOLNIK: I'm still having trouble</p> <p>9 hearing you.</p> <p>10 BY MR. LANDY:</p> <p>11 Q. So I'm starting approximately -- starting</p> <p>12 about halfway down the page with Mr. Aviv where he</p> <p>13 starts, "Also update your files," and it goes as</p> <p>14 such.</p> <p>15 "Aviv: Also update your files, if there is,</p> <p>16 find out the latest in the cult. You have anything,</p> <p>17 you know new is going on, because I think that will"</p> <p>18 -- sorry -- "that what will impress her that you</p> <p>19 know about them everything. That's what is going</p> <p>20 currently and things like that."</p> <p>21 "Ross: How's this for impressive: I have</p> <p>22 200 photographs of Raniere at one of his functions.</p> <p>23 I have him in compromising poses with his (sic)</p> <p>24 girlfriends."</p> <p>25 "Aviv: Oh, my God!</p>
<p style="text-align: right;">Page 330</p> <p>1 what we will be discussing is the section on the</p> <p>2 CD that runs from 55 minutes and 32 seconds to 57</p> <p>3 minutes and 34 seconds.</p> <p>4 I've spoken with your counsel while off the</p> <p>5 record, and he's agreed to in lieu of me actually</p> <p>6 playing this excerpt handing out a transcript of the</p> <p>7 excerpt which was prepared by my office. This is</p> <p>8 not an official transcript. We did our best to be</p> <p>9 as accurate as possible.</p> <p>10 MR. CAMPION: Okay. Let's go.</p> <p>11 MR. LANDY: All right, and this is going</p> <p>12 to be marked as Raniere-Exhibit 17.</p> <p>13 (Excerpt From Audio Recording of Meeting</p> <p>14 Among Rick Ross, Juval Aviv, and Lynne Friedman on</p> <p>15 November 23, 2004, consisting of two pages was</p> <p>16 received and marked Defendant's Exhibit Raniere-17</p> <p>17 for Identification.)</p> <p>18 MR. CAMPION: Obviously, the witness and</p> <p>19 his counsel are not in a position to affirm or deny</p> <p>20 the accuracy of the translation, but we accept the</p> <p>21 representation you have made and believe the</p> <p>22 questioning should now proceed.</p> <p>23 MR. LANDY: Okay.</p> <p>24 BY MR. LANDY:</p> <p>25 Q. In the interest of time, I'm not going to go</p>	<p style="text-align: right;">Page 332</p> <p>1 Ross: I have him in the nude. I have, I</p> <p>2 have one picture of him naked standing in front of</p> <p>3 his girlfriend with a red ribbon tied around his</p> <p>4 penis.</p> <p>5 Aviv: No!</p> <p>6 Ross: Which is erect.</p> <p>7 Aviv: Oh, my God! (Laughter)."</p> <p>8 Did Ms. Keeffe tell you about those</p> <p>9 statements that Mr. Ross made?</p> <p>10 A. I believe she mentioned the photograph with</p> <p>11 the ribbon, and I heard that there were many</p> <p>12 photographs supposedly, me in the shower and such</p> <p>13 things. I don't know if it was her.</p> <p>14 Q. Moving on to the second page of the</p> <p>15 transcript, the second quote from Mr. Ross says:</p> <p>16 "Ross: No, I guarantee you she hasn't. I</p> <p>17 have letter written. I can get a copy of a letter</p> <p>18 written in his own hand in which he states all of</p> <p>19 these things (sic) that I am telling you and about</p> <p>20 the Christ child, how you will bear my seed in your</p> <p>21 womb. Crazy stuff and court records that have</p> <p>22 nothing" (sic) -- "that have to do with harassment</p> <p>23 of his former girlfriend."</p> <p>24 Do you know what letter he's referring to</p> <p>25 here? By "he," I mean Mr. Ross.</p>

Page 333	Page 335
<p>1 A. No.</p> <p>2 Q. Did Ms. Keefe tell you about this letter?</p> <p>3 A. I don't believe she told me about the letter.</p> <p>4 Q. You can put it aside.</p> <p>5 MR. McGUIRE: Just one second, Bob.</p> <p>6 (A discussion was held off the record.</p> <p>7 MR. LANDY: Go on?</p> <p>8 MR. McGUIRE: Yes.</p> <p>9 MR. LANDY: Okay.</p> <p>10 BY MR. LANDY:</p> <p>11 Q. Do you know whether a purpose of the Ross</p> <p>12 investigation was to find out about Ross' past?</p> <p>13 A. The purpose -- I suspect when you investigate</p> <p>14 someone you do a dossier of some sort on them. I</p> <p>15 don't know if that was the purpose necessarily.</p> <p>16 Q. No. I'm not asking you to speculate. I'm</p> <p>17 asking you whether you know what the purpose was.</p> <p>18 A. I don't know.</p> <p>19 Q. Do you know whether, in fact, Interfor</p> <p>20 collected information about Ross -- Mr. Ross' past?</p> <p>21 A. No, I don't know.</p> <p>22 Q. I won't use the word "purpose" then.</p> <p>23 Do you know whether one of the objections --</p> <p>24 objections -- start again.</p> <p>25 Do you know whether one of the objectives of</p>	<p>1 obtained information concerning who Mr. Ross was in</p> <p>2 communication with?</p> <p>3 A. No, I don't know.</p> <p>4 Q. You partially answered this yesterday, but</p> <p>5 have you ever spoken with anyone who is a member of</p> <p>6 the Church of Scientology?</p> <p>7 A. Yes.</p> <p>8 Q. Have you ever spoken to anyone who is a</p> <p>9 member of the Church of Scientology about Rick Ross?</p> <p>10 A. No -- oh, well, maybe. It's possible.</p> <p>11 Q. Do you know who that conversation would have</p> <p>12 been with?</p> <p>13 A. Sean Bergeron.</p> <p>14 Q. Who is Mr. Bergeron?</p> <p>15 A. I play volleyball with him. He's a student</p> <p>16 at NXIVM. He's a friend. I tutored him in biology.</p> <p>17 Q. But you don't remember the substance of any</p> <p>18 conversations concerning Mr. Ross?</p> <p>19 A. No. It would be just something in passing or</p> <p>20 general.</p> <p>21 Q. Have you ever seen any documents or</p> <p>22 information -- start that again.</p> <p>23 Have you ever seen any documents or</p> <p>24 information concerning Mr. Ross that you understood</p> <p>25 to be from the Church of Scientology or from a</p>
Page 334	Page 336
<p>1 the Ross investigation was to find out about</p> <p>2 Mr. Ross' finances?</p> <p>3 A. No, I don't know that.</p> <p>4 Q. Do you know whether Interfor, in fact, did</p> <p>5 learn anything about Mr. Ross' finances?</p> <p>6 A. I've heard from the Metroland article that</p> <p>7 the reporter, Chet Hardin, spoke to Rick Ross on the</p> <p>8 phone and identified that within the report there</p> <p>9 were accurate financial transactions from Rick Ross.</p> <p>10 That's as much as I know. As much as that is true,</p> <p>11 that's as much as I know.</p> <p>12 Q. Did you ever speak to Ms. Keefe about</p> <p>13 financial information that Interfor had uncovered</p> <p>14 concerning Mr. Ross?</p> <p>15 A. No.</p> <p>16 Q. Did you ever speak to Ms. Salzman about it?</p> <p>17 A. No.</p> <p>18 Q. Was one of the objections -- I did it again.</p> <p>19 Start again.</p> <p>20 Was one of the objectives of the Ross</p> <p>21 investigation to find out who Mr. Ross communicated</p> <p>22 with?</p> <p>23 A. I'm not sure. I -- I don't know that for</p> <p>24 sure.</p> <p>25 Q. Do you know whether, in fact, Interfor</p>	<p>1 person affiliated with the Church of Scientology?</p> <p>2 A. Say that again. Have I ever seen any</p> <p>3 documents from --</p> <p>4 Q. Let me start the question again.</p> <p>5 Have you ever seen any documents that you</p> <p>6 understood to be from a representative or a member of</p> <p>7 the Church of Scientology concerning Mr. Ross?</p> <p>8 A. I think so.</p> <p>9 Q. What have you seen?</p> <p>10 A. There is a woman -- I think her name is Nancy</p> <p>11 Anamann or something like that -- who allegedly got</p> <p>12 a whole bunch of information, and it's on a CD and</p> <p>13 available on the Internet or some such thing. I</p> <p>14 have seen some things from that. I believe it's</p> <p>15 from that.</p> <p>16 Q. How did you come to see that information?</p> <p>17 A. I think --</p> <p>18 THE WITNESS: 'Cause this involves an</p> <p>19 attorney.</p> <p>20 MR. CAMPION: Attorney-client privileged</p> <p>21 material will be waived.</p> <p>22 THE WITNESS: Okay.</p> <p>23 A. I'm not sure if I've seen it outside of that.</p> <p>24 I don't know.</p> <p>25 Q. Is it your understanding that Ms. Keefe</p>

1 attended to the day-to-day management of Interfor's
2 investigations?

3 MR. McGUIRE: Object to the form of that
4 question.

5 Q. Let me rephrase it.

6 Is it your understanding that Ms. Keeffe was
7 Interfor's primary contact at NXIVM?

8 A. She was definitely a contact at NXIVM. I
9 don't know if she was the primary contact because
10 she and Joe worked very closely together on such
11 matters.

12 Q. Did Ms. Keeffe ever tell you that Interfor
13 had collected Mr. Ross' trash as part of the
14 investigation?

15 A. I don't know if she told me. I have heard
16 that, and I've seen it in the --

17 Q. When did you --

18 A. -- documentation.

19 Q. Do you know when you first heard it?

20 A. It may have been after Joe left I think I
21 heard that he had -- maybe he had trash or something
22 like that that had -- that had something that had to
23 be -- that had to be decided what to do with or
24 whatever.

25 Joe was saying all sorts of complaints, and I

1 Q. The answer was?

2 A. No.

3 Q. Okay.

4 A. I'm sorry.

5 Q. Was Interfor's investigation of Rick Ross
6 part of a larger public relations campaign to
7 improve NXIVM's image?

8 A. I might classify it that way, I imagine.

9 Q. Have you heard of a company called Sitrick &
10 Company -- Sitrick & Co.?

11 A. Yes.

12 Q. What is Sitrick & Co.?

13 A. To my knowledge, they're a PR firm.

14 Q. Okay. Do you know whether Sitrick & Co. And
15 Interfor worked in concert on behalf of NXIVM?

16 A. I'm not sure.

17 Q. What was Sitrick hired to do?

18 A. Create a branding image for NXIVM and to
19 create positive press. In specific, I think the
20 head of Sitrick had said that he had a re -- a good
21 relationship with Forbes magazine so that an article
22 might be run to counter the other article.

23 Q. Was part of what Sitrick was hired to do to
24 discredit Mr. Ross?

25 A. I don't know.

1 think at that point I heard that that was from
2 Rick Ross, possibly from Kristin.

3 Q. Possibly from --

4 A. Kristin.

5 Q. The trash was from Rick Ross. The
6 information was possibly from Kristin, just to --

7 A. Correct.

8 Q. -- be clear.

9 A. And that's what I heard. I never saw the
10 trash.

11 Q. Again, the question was when. You testified
12 around the time that --

13 A. It was that spring. I'm trying to think of
14 what year it was but --

15 Q. 2005?

16 A. Yeah. It was something like March, somewhere
17 in there.

18 Q. Were you ever made aware of what the sources
19 of Interfor's information was?

20 A. No.

21 Q. Do you know whether Interfor received
22 documents from the Scientologists?

23 A. No.

24 Q. Do you know who Kendrick Moxon is?

25 A. No.

1 Q. I'm going to ask you a couple questions
2 concerning Ms. Keeffe.

3 Do you have an understanding of what her
4 responsibilities at NXIVM were in the period of 2004
5 to 2005?

6 A. Not completely, no.

7 Q. Do you have a partial understanding?

8 A. (No audible response.)

9 Q. What is your partial understanding?

10 A. She worked closely -- well, when Joe was
11 around, she worked closely with Joe. She also works
12 closely with the NXIVM attorneys. She does like
13 paperwork and things like that, and when they need
14 data, she gather data from what I understand.

15 Q. Is it her job to hire and fire outside
16 counsel?

17 A. No.

18 Q. Did -- in the period of 2004 and 2005,
19 are you aware if whether -- are you aware if
20 Ms. Keeffe ever conducted investigations on her
21 own on behalf of NXIVM?

22 A. She may have. I don't know. It implies --
23 when she says things relating to the internet like
24 Juval Aviv got stuff off of the internet, I mean,
25 she probably has looked on the internet so...

Page 341	Page 343
<p>1 Q. Between 2004 or in the period of 2004 to 2005 2 -- let me start the question again. 3 Do you know whether in the time frame of 2004 4 or 2005 Ms. Keeffe conducted any surveillance on any 5 property on behalf of NXIVM? 6 A. Surveillance on property. 7 Q. By "property," I mean an address. 8 A. And surveillance. Where -- 9 Q. I mean, it's -- let me -- 10 A. I have a piece of information, and it may 11 fall in this bailiwick. I had heard that when Rick 12 Ross first moved here, he lived in a small 13 apartment. Now he lives in a very large apartment. 14 I don't know if she went and looked that on the 15 internet or how she knows that, but it seems 16 reasonable if she makes a trip to New Jersey to 17 drive by an address to see what it looks like. She 18 seemed to have opinions about it. 19 Q. What did Ms. Keeffe say when she told you 20 about Mr. Ross' apartments? Let me back that up. 21 That assumes that Ms. Keeffe told you that. 22 How did you come to learn that Ms. Keeffe 23 knew what Mr. Ross' apart -- two apartments looked 24 like? 25 A. How did -- I'm sorry.</p>	<p>1 Q. Have you ever been arrested? 2 A. I don't know. I did a traffic infraction 3 once. 4 Q. If that's your answer, that's fine. 5 A. Yeah, I -- yeah. 6 Q. Have you ever been convicted of a crime? 7 A. No. 8 Q. Bear with me for about two minutes. I think 9 I'm done. I'll just review my notes. 10 Do you know whether NXIVM and Frank Parlato, 11 Jr. Ever had a falling out? 12 A. I believe so. 13 Q. Do you know the circumstances of that? 14 A. No, I don't know the complete circumstances. 15 Q. Do you know who would? 16 A. Kristin probably would. 17 Q. Would Ms. Salzman? 18 A. I suspect she would, but I'm not sure. 19 MR. LANDY: That's a different day. 20 I'll actually ask her. 21 All right. I think I got one follow-up. 22 Let me look at my notes from earlier. 23 Sir, thank you for your time. I have no 24 further questions. 25 THE WITNESS: Thank you.</p>
Page 342	Page 344
<p>1 Q. How did you come to learn that Ms. Keeffe had 2 an understanding of what Mr. Ross' apartments looked 3 like? 4 A. She told me that she thinks Mr. Ross has a 5 good degree of wherewithal. 6 Q. Did she say anything else during that 7 conversation concerning Mr. Ross? 8 A. No. 9 Q. Did Ms. Keeffe ever tell you that she had 10 obtained Mr. Ross' phone records? 11 A. No. 12 Q. Did Ms. Keeffe ever tell you that she 13 obtained Ms. Natalie's phone records? 14 A. No. 15 Q. Has Keith Raniere always been your legal 16 name? 17 A. Yes. 18 Q. I'm sorry. 19 A. Alan -- 20 Q. Has Keith Alan Raniere always been -- 21 A. Yes. 22 Q. -- your legal name? 23 In the period of 2004 to 2005, did you have 24 an office? 25 A. Probably not. No, I don't think so.</p>	<p>1 MR. SKOLNIK: The record should reflect 2 that I'm going to start questioning Mr. Raniere now. 3 I have several hours of questions for Mr. Raniere, 4 and I have already been advised by counsel that 5 you're planning to cut this deposition off today at 6 5:30. If that's the case, rest assured that I'll be 7 making an application to the Court for another -- 8 another day, and I would suggest and I want it on 9 the record that I'm suggesting that before we all 10 adjourn today, since we are all here, that we try 11 to agree upon an adjourned date. 12 I'm assuming that you'll oppose the 13 application for another date, but I think that we 14 ought to agree upon a resumed date of the deposition 15 if Judge Falk or Judge Cavanaugh grants my request 16 to continue the deposition. 17 MR. CAMPION: Mr. Skolnik, we're 18 prepared to go until 7:00 today if that will 19 conclude the deposition. 20 MR. SKOLNIK: It will not. 21 MR. CAMPION: Okay. 22 MR. McGUIRE: That would take us to more 23 than two days. 24 MR. SKOLNIK: I mean, the record -- the 25 record will reflect the amount of time that</p>

<p style="text-align: right;">Page 345</p> <p>1 Mr. Raniere has actually been questioned when you 2 take into consideration among other things the break 3 that we all took yesterday for the best part of 4 almost two hours for our negotiation; but that 5 aside, no matter how many hours have actually been 6 placed on the record, I'm going to be applying for a 7 new amount of time. 8 MR. CAMPION: Okay. 9 10 CROSS-EXAMINATION BY MR. SKOLNIK: 11 Q. Mr. Raniere, I think you know I'm Peter 12 Skolnik, and I represent the Ross defendants and the 13 Martin defendants; and the same rules that have been 14 applying for the questioning by other counsel apply 15 as well. 16 You understand that? 17 A. Yes. 18 Q. And you understand you're still under oath? 19 A. Yes. 20 Q. Okay. You testified earlier today that 21 Frank Parlato had been hired to generate positive 22 press for NXIVM, is that right? 23 A. I believe so. 24 Q. Why? 25 A. I imagine because NXIVM has negative press.</p>	<p style="text-align: right;">Page 347</p> <p>1 consultant. 2 Q. Who was that consultant? 3 A. I think it was Steve Pigeon, but I'm not 4 sure. 5 Q. And what kind of consulting did Mr. Pigeon do 6 for NXIVM? 7 A. I don't know exactly. I think he's a lawyer. 8 Q. You testified that you found Mr. Parlato to 9 be aggressive. 10 A. Yes. 11 Q. In what way was he aggressive? 12 A. In the way he spoke, in the way he moved, in 13 some of the things that he said. 14 Q. What kinds of things did he say? 15 A. He believed that making statements to the 16 media was good and stating things that he believed 17 to be true to the media was good. I believe that if 18 you deal with the media, they may well take what you 19 say or not. They may take it out of context, and he 20 believed in speaking to the media, talking to the 21 media, giving interviews with the media and things 22 like that. 23 Q. Did he ever tell you that he thought making 24 misrepresentations to the media was in NXIVM's best 25 interests?</p>
<p style="text-align: right;">Page 346</p> <p>1 Q. So what kind of press in particular was 2 Mr. Parlato hired to try to generate? 3 A. I don't know specifically. 4 Q. Do you know generally? 5 A. I imagine positive articles, positive stories 6 relating to NXIVM. 7 Q. And what is the basis for your knowledge 8 about Mr. Parlato's assignment? 9 A. Some things that Mr. Parlato has told me. 10 Q. Do you know about his assignment from anyone 11 other than Mr. Parlato himself? 12 A. Somewhat from Kristin Keeffe, I believe. 13 Q. What did Kristin Keeffe tell you? 14 A. I think she had a great degree of belief in 15 Frank's ability to handle the media, that he was 16 strong, that he had media connections so that he 17 could get events covered and positive press. 18 Q. How did she know Mr. Parlato? 19 A. She worked with him quite a bit. I think 20 they were friends. 21 Q. When you say she worked with him, she worked 22 with him prior to her involvement with NXIVM or 23 prior to his involvement with NXIVM? 24 A. No. It's my understanding she met him 25 through NXIVM. I think she met him through a NXIVM</p>	<p style="text-align: right;">Page 348</p> <p>1 A. No, and that's something that I would not 2 agree with. 3 Q. But he never told you that? 4 A. No. 5 Q. And he never told you that he was going to 6 use aliases to represent NXIVM to the media? 7 A. No. 8 Q. What did you conclude when you found out 9 about that? 10 A. Found out about? 11 Q. That he had used an alias in talking to the 12 media. 13 A. I found out about that today. 14 Q. And how did you react today? 15 A. I -- I think it's horrible. I don't agree 16 with it. 17 Q. Now, you told us that you and Mr. Parlato 18 discussed Mr. Ross, and I think you said that -- 19 that Mr. Parlato's opinion was that Mr. Ross was 20 the lowest of the low. 21 Was that your phrase? 22 A. Yes. 23 Q. What was the basis for his opinion? 24 A. I don't know. 25 Q. Did you ask him?</p>

Page 349

1 A. He said to me, "I know his type."
2 I believe his basis for the opinion was
3 reading what was on the internet.
4 Q. Did you ask him what the basis for his
5 opinion was?
6 A. No.
7 Q. Do you simply take people's word for that
8 kind of thing without investigating what -- what
9 they're talking about?
10 A. I think you're assuming that I believed what
11 he said. I believe that he believed that. I didn't
12 think he was lying to me, that he believed Ross was
13 the lowest of the low.
14 Q. So you didn't explore the subject with him at
15 all? You didn't -- you didn't challenge him?
16 A. No.
17 Q. We need verbal answers.
18 A. No, I did not challenge him.
19 Q. Now, you testified that you told Joseph
20 O'Hara to hire both of the firms that had been
21 suggested by Nolan & Heller.
22 A. I suggested.
23 Q. Right, and that you suggested they both be
24 given a simple assignment and to compare the
25 results.

Page 350

1 A. Uh-huh.
2 Q. Why was O'Hara suggesting that NXIVM hire any
3 firm?
4 MR. McGUIRE: Object to the form of the
5 question.
6 Q. You can answer.
7 A. I don't understand. Oh --
8 MR. CAMPION: You may answer.
9 THE WITNESS: Okay.
10 A. I think there is a suspicion -- was a
11 suspicion that there was money politically put
12 against us so that we did not get good press and
13 that we did not get a fair hearing in the media and
14 in the political arenas. So the question has always
15 been if this is true; and then if this is true, who,
16 how, what is -- what is behind it?
17 Q. Who had that suspicion?
18 A. I -- I think I've shared that suspicion to a
19 degree. I think Nancy shares that suspicion. I
20 think Kristin shares that suspicion. I think a
21 number of people do.
22 Q. Who suggested to Mr. O'Hara that he try to
23 get names of investigators?
24 A. I don't know.
25 Q. Did he approach you about the idea of hiring

Page 351

1 investigators?
2 A. Yes. As a matter of fact, I think he
3 originally approached because he wanted to find
4 someone who would find Kris Snyder.
5 Q. Why did he want to find someone who could
6 find Kris Snyder?
7 A. Because some people believe, as I do, that
8 Kris Snyder is likely alive.
9 Q. Were either of the simple assignments that
10 you suggested be given to the two firms suggested by
11 Nolan & Heller related to the search for Kristin
12 Snyder?
13 MR. LANDY: I warn counsel that we're
14 now going into an area that's outside of Judge
15 Treece's opinion concerning which portion of
16 Interfor's relationship with NXIVM the
17 attorney-client privilege had been waived on.
18 THE WITNESS: Also, I believe Joe O'Hara
19 was my attorney.
20 MR. LANDY: I can't instruct anyone to
21 answer or not answer. I'm just making a statement.
22 MR. CAMPION: Could I have the question
23 again, please?
24 MR. SKOLNIK: Could you read it back?
25 (The following was read back by the

Page 352

1 reporter:
2 "Were either of the simple assignments
3 that you suggested be given to the two firms
4 suggested by Nolan & Heller related to the search
5 for" --)
6 MR. CAMPION: Okay. That does not
7 involve a privilege question.
8 Continuing...
9 A. I didn't specify the assignment. I said it
10 should be simple and verifiable.
11 Q. I want to ask you to call upon your powers of
12 recall and give me the best recollection you have
13 today of the sequence of your knowledge about
14 NXIVM's involvement with Interfor.
15 What did you know, when did you know it, and
16 who did you know it from?
17 A. I knew from Joe O'Hara that there existed
18 Interfor. They were one of two firms that Nolan &
19 Heller, an attorney firm, had used or suggested and
20 I don't know which. I was aware I think NXIVM ended
21 up using both firms on an ongoing basis. I don't
22 know how long the other firm was used.
23 Q. Do you know what the other firm was used for?
24 A. No.
25 MR. McGUIRE: Mr. -- oh, I'm sorry.

<p style="text-align: right;">Page 353</p> <p>1 Go ahead. Finish your answer. I beg 2 your pardon. 3 THE WITNESS: Okay. 4 A. I do consider Joe O'Hara my attorney so I 5 don't know what to -- 6 MR. McGUIRE: Well, that's what I was 7 just going to put on the record. 8 At the last deposition -- I think it was 9 of Ms. Keefe -- it was agreed that we would reserve 10 our rights concerning the attorney-client 11 relationship with Mr. O'Hara. 12 So with your agreement, I will stipulate 13 or you will stipulate and the two of us will 14 stipulate that we're reserving all of those rights. 15 MR. SKOLNIK: Agreed. 16 MR. McGUIRE: Okay. 17 MR. CAMPION: Continue to answer the 18 question without reference to conversations with 19 O'Hara. 20 MR. McGUIRE: Unless they took place 21 after a point in time where in the Treece opinion 22 O'Hara conceded that he became the attorney for 23 NXIVM. I think that was sometime in July, if I 24 recall. 25 MR. SKOLNIK: So the record is clear --</p>	<p style="text-align: right;">Page 355</p> <p>1 by counsel without reference to communications 2 between you and O'Hara, okay. 3 THE WITNESS: Do I delete them? 4 MR. CAMPION: Indicate at the beginning 5 of your answer that you are not including those 6 conversations, okay. 7 THE WITNESS: Okay. 8 How do -- if I have found factual 9 information through O'Hara that I know, how do I 10 add that in? 11 MR. CAMPION: There's the communication 12 that is privileged. What you do with the result of 13 the communication may not be privileged, okay. 14 Proceed. 15 THE WITNESS: Okay. 16 Continuing... 17 A. I'm trying to think of what I heard next. I 18 have heard that -- I heard that Juval had some 19 incredible stories about what was going on with us 20 politically. I heard that Juval had said that the 21 Legions of Christ from Mexico were against us, but 22 the Masons were for us and that the Legions of 23 Christ -- some representative from there had come up 24 to New York and given Senator Alphonse D'Amato a 25 substantial portion of money to go and execute</p>
<p style="text-align: right;">Page 354</p> <p>1 and, Mr. Campion, for your benefit because I know 2 you haven't been following all of this for as long 3 as the rest of us -- it's our position that the 4 rulings that Judge Falk has made and that Judge 5 Treece has made make the entire Interfor 6 investigation outside of the attorney-client 7 privilege. 8 There were findings about the Crime 9 Fraud Doctrine, so it's our position that there is 10 no attorney-client privilege attaching to Mr. O'Hara 11 or to any other aspect of that investigation. 12 That's the basis upon which Mr. McGuire and I and 13 other counsel came to an agreement about such 14 questions during the Keefe deposition. 15 MR. CAMPION: Okay. 16 MR. McGUIRE: That's an overstatement. 17 And let me quote from the Treece opinion, which is 18 that "Ross and O'Hara should not conclude that this 19 decision and order has opened the corral doors to 20 allow that which may be protected by the 21 attorney-client privilege be trampled. It is very 22 limited and it does not include the whole Interfor 23 relationship." 24 MR. CAMPION: In any event, so that we 25 can continue this, you may answer the question put</p>	<p style="text-align: right;">Page 356</p> <p>1 agenda items against us. 2 Q. All right. Let me interrupt you just so that 3 we could get the sequence here -- 4 MR. McGUIRE: Well -- 5 Q. -- because what I'm interested in is the 6 sequence. 7 MR. McGUIRE: Mr. Skolnik, let him 8 answer the question. You want to follow up on it, 9 fine, but you -- 10 MR. SKOLNIK: How many lawyers are 11 making objections here? 12 MR. McGUIRE: Wait a minute. Just a 13 second. I don't interrupt you. Please don't 14 interrupt me. We'll get along much better. 15 We can all sing together, but we can't 16 talk together. 17 You asked him a question. The gentleman 18 was in the process of giving you an answer. Wait 19 until he finishes his answer. Then if you have any 20 objection, move to strike anything or have any 21 additional questions, proceed; but you do not have 22 the right unilaterally to stop this man from 23 answering a question. 24 MR. CAMPION: Mr. Skolnik, it appeared 25 to me it was an open-ended question.</p>

<p style="text-align: right;">Page 357</p> <p>1 MR. SKOLNIK: It was indeed an 2 open-ended question, but I was asking for sequence; 3 and it seemed to me that we would be better able to 4 establish sequence if I occasionally asked for some 5 time frames. 6 But if you want to go and give me the 7 entire story, then we'll backtrack on it. We're 8 just going to be here longer. 9 MR. CAMPION: Continue with the answer. 10 Continuing... 11 A. That was the next thing I remember now 12 hearing about it and that I also heard then that 13 Juval had a neighbor that knew Alphonse D'Amato and 14 that Alphonse D'Amato could be, if you will, stopped 15 as far as harassing us and that, in fact, Alphonse 16 D'Amato no longer had much interest in it because he 17 had done what he was paid for. 18 I'm not sure what time those series of events 19 that I heard from Interfor. I am not sure if I 20 actually heard that before I met Juval Aviv, the 21 night that I met him at Nancy's. I think I heard 22 that afterwards. When I met Juval, he was telling 23 me at Nancy's about himself; and I think had I known 24 that information, I would have evaluated the data 25 differently.</p>	<p style="text-align: right;">Page 359</p> <p>1 Q. Okay. Did you meet Mr. Aviv at Nancy 2 Salzman's house before or after the investigation 3 had commenced? 4 A. I think it was after, although I don't know 5 when the investigation commenced 'cause Rick -- 6 because Juval mentioned Ross in conversation. So I 7 imagine that if he was mentioning Ross like that, he 8 would have already been investigating. 9 Q. Did he mention anything about the meeting 10 that had been conducted with Mr. Ross? 11 A. No. 12 Q. Were you aware at the time you met Mr. Aviv 13 that a meeting with Mr. Ross had taken place? 14 A. No. 15 Q. Who told you about Juval Aviv claiming to 16 have had a prior relationship with Rick Ross and had 17 been asked to fabricate evidence? 18 A. I believe Kristin Keeffe told me that. It 19 may have been that Juval mentioned that at Nancy's 20 house. 21 Q. Are you saying that you either heard it from 22 Kristin Keeffe or you heard it directly from Juval? 23 A. Or both. 24 Q. Or both, but you can't recall today? 25 A. No, I cannot.</p>
<p style="text-align: right;">Page 358</p> <p>1 I don't remember where in the sequence of 2 events was the first time that I heard that Juval 3 had a preexisting relationship with Rick Ross. I 4 heard that Juval had this preexisting relationship 5 and that allegedly Juval did not want to work with 6 Rick Ross because allegedly Rick Ross wanted him to 7 fabricate evidence. 8 I'm not sure about when I heard the results 9 of the sting, so to speak, or whatever you want to 10 call it. I did hear that there was a meeting and 11 that the meeting was recorded and that there were 12 representations made in the meeting which -- some of 13 which I've said already. 14 Is there more? 15 Q. The information that you heard about Juval 16 Aviv's statements about Senator D'Amato and the 17 Children of Christ, did you hear that information 18 about Mr. Aviv before the investigation itself of 19 Rick Ross commenced? 20 A. I don't know. I don't know when the 21 investigation of Rick Ross commenced. 22 Q. So you might have heard it before the 23 investigation commenced, and you might have heard 24 it while the investigation was ongoing? 25 A. Yes, I think that that may be so.</p>	<p style="text-align: right;">Page 360</p> <p>1 Q. When you became aware of the fact that NXIVM 2 had retained Interfor to investigate Mr. Ross, you 3 knew that a lawsuit against Mr. Ross by NXIVM was 4 already pending; didn't you? 5 A. I'm not sure of the sequence. I think that's 6 possible. 7 Q. But you never discussed with anyone the 8 propriety of -- 9 A. I would have had -- I believe I would have 10 had to have known because Joe O'Hara came on after 11 the lawsuit with NXIVM; and Joe O'Hara hired Nolan & 12 Heller which hired Juval's firm, so yes. 13 Q. Okay, and did you ever discuss with anyone 14 the propriety of NXIVM arranging to interview 15 Mr. Ross through Interfor without Mr. Ross having 16 counsel present while a lawsuit against him was 17 pending? 18 MR. McGUIRE: Object to the form of that 19 question. 20 A. No. 21 Q. You told us that Kristin Keeffe was friendly 22 with Juval Aviv. 23 A. Yes. 24 Q. How was she friendly? How did she know him? 25 A. Well, I think she met him professionally, but</p>

1 it was my impression that they became friends.

2 Q. Did they become friends before he was
3 retained by NXIVM?

4 A. I don't know for sure. I don't think -- no,
5 it wouldn't make sense that she would have.

6 Q. Do you have any understanding about whether
7 she had a prior relationship with Mr. Aviv while she
8 worked at NXIVM?

9 A. In other words, did she know -- did she have
10 a relationship with Mr. Aviv before Mr. Aviv came to
11 NXIVM's attention?

12 Q. Yes.

13 A. Okay. I don't know Kristin's personal life,
14 but I don't have that impression.

15 Q. To your knowledge, has Kristin Keffe ever
16 been arrested?

17 A. No. I don't know for sure.

18 Q. You never heard that she was arrested
19 breaking into Toni Natalie's house?

20 A. Oh, I heard that there was -- okay, then she
21 was probably arrested. Yes, I heard that she
22 delivered a present to Toni Natalie and that Toni
23 Natalie waged a complaint against her and that they
24 went to court over it.

25 Q. Who told you that she was delivering a

1 Q. Whose job at NXIVM is it to hire outside
2 counsel?

3 A. I think ultimately it's Nancy's. She has not
4 had that job the whole time, being it was Joe's job
5 for a time. There was also another woman at one
6 point who was acting as a counsel. I don't know if
7 -- I think there was another man named Alan Korman
8 who also had that job.

9 Q. When NXIVM hires outside counsel, are you
10 consulted?

11 A. Often not. Sometimes I have been.

12 Q. Have you been consulted about the counsel
13 that NXIVM has hired to represent it in this
14 litigation?

15 A. Which one?

16 Q. Funny you should ask.

17 Have you been involved in the decisions that
18 have been made periodically to replace counsel?

19 A. I think sometimes comments I have made have
20 fomented the replacement of counsel. No, I am not
21 involved with that.

22 Q. I want to clarify some of your testimony in
23 response to Mr. Kofman's questions yesterday.
24 Excuse me.

25 You have no personal knowledge that Rick Ross

1 present to Toni Natalie?

2 A. Kristin did.

3 Q. Are you under the impression that she was
4 delivering this present when Toni Natalie was home?

5 A. Yes.

6 Q. So it's not your understanding that she was
7 breaking into Toni Natalie's house?

8 A. Correct.

9 Q. Okay, and it's not your impression that she
10 was trying to uncover the very letter that is
11 referred to in the transcript that we looked at
12 earlier?

13 A. A letter -- oh, no. No.

14 Q. What did you discuss with Mr. Bergeron about
15 Rick Ross?

16 A. I don't -- you know, over time, because he's
17 a friend and I see him two, three times a week, I
18 said to him -- and I tutor him -- he has read the
19 internet that Rick Ross thinks we're like
20 Scientology and different things, so I think it's
21 his opinion that we're not like Scientology.

22 He asks sometimes, you know, "How is the
23 legal stuff going, do you know? How is the PR
24 going?" You know, "What's going on?" Those sort of
25 things.

1 told Aaron Kassin or anyone else that he "wanted
2 NXIVM's confidential information," isn't that right?

3 A. When you say "personal knowledge," did I hear
4 him say that directly? No.

5 Q. Well, you didn't hear him say it directly?

6 A. No.

7 Q. So what, if any, basis do you have for
8 believing that Rick Ross told Aaron Kassin that he
9 wanted NXIVM's personal information?

10 A. I think I saw it in some of the papers here,
11 and I think I remember hearing it maybe from Michael
12 Sutton.

13 Q. Okay. But, again, you have no personal
14 knowledge about that?

15 A. Correct.

16 Q. And is it also true that you have no personal
17 knowledge of the actual process through which NXIVM
18 materials were given to Rick Ross?

19 A. Correct.

20 Q. Kristin Keffe asked you to look for any
21 notes that you had taken either on or about the
22 three articles, is that right?

23 A. Yes.

24 Q. And you didn't find any?

25 A. No written notes. I believe there were some

1 documents that I turned over.
2 Q. Who did you turn them over to?
3 A. I think I gave them to Kristin or -- I don't
4 know if Joe was involved or whatever. I don't know
5 who I gave them to specifically.
6 Q. And when you say you think there were some
7 documents, documents of what nature?
8 A. Word-type files, either printouts of them or
9 the files themselves.
10 Q. You remember there being such documents?
11 A. Yes.
12 Q. And you remember turning them over to
13 someone?
14 A. I believe so.
15 Q. And you might have turned them over to
16 Kristin Keeffe?
17 A. Yes.
18 Q. And you might have turned them over to who
19 else?
20 A. Joe O'Hara.
21 Q. To Joe O'Hara. Anyone else that you might
22 have turned them over to?
23 A. Not that I can think of.
24 MR. SKOLNIK: Let me request on the
25 record those documents have never been produced in

1 this litigation. To the extent that NXIVM is in
2 possession of them, I'd call for their production.
3 THE WITNESS: NXIVM wouldn't be unless
4 they turned them over.
5 MR. McGUIRE: We've given you everything
6 we have.
7 When I say "we," we and prior counsel.
8 BY MR. SKOLNIK:
9 Q. Were all of the requests that Kristin Keeffe
10 made to you to look for documents, specific ones
11 like look for X or look for Y, as opposed to look
12 for any documents relating to this litigation?
13 A. No. They're normally more general, although
14 there have been times when there have been specific
15 requests.
16 Q. And did those requests invariably come from
17 Kristin Keeffe?
18 A. No.
19 Q. Who else made those requests?
20 A. Joe O'Hara, Bob Leonard.
21 Q. Since Joe O'Hara has no longer been involved
22 in the litigation, did anyone other than Kristin
23 Keeffe and your attorneys make those requests?
24 A. I don't believe so.
25 When you say my attorneys, not me

1 specifically, but NXIVM.
2 Q. NXIVM's attorneys.
3 And you may have answered this previously,
4 but I can't recall. Did anyone ever come and search
5 through your documents?
6 A. Search through my documents?
7 Q. Yeah, looking for documents --
8 A. Not at my house. In the storage area, yes.
9 Q. In the storage area?
10 A. Yeah.
11 Q. Who searched in the storage area?
12 A. I don't know.
13 Q. And what about documents at your house?
14 A. I looked for them.
15 Q. No one else came --
16 A. No one else.
17 Q. -- and helped you look for them?
18 A. Right, correct.
19 Q. Are those the only two places where you might
20 have had any documents relating to this lawsuit?
21 A. I believe so.
22 Q. Did anyone ever examine the e-mails on your
23 computers?
24 A. No, just me.
25 Q. Since this litigation began, have you deleted

1 any e-mails whatsoever from your computer relating
2 in any way to the litigation or the issues in the
3 litigation?
4 A. Well, I've had different computers; and I've
5 had different hard drives. No, I haven't
6 specifically deleted them, but they have been
7 deleted as a matter of that course.
8 Q. When you say, "as a matter of that course,"
9 the replacing of computers?
10 A. Yes.
11 Q. But no one ever told you that those had to be
12 preserved?
13 A. No, and I'm not aware of that many of them.
14 I don't -- I don't think there was even anything I
15 was receiving that was important, as far as that
16 goes.
17 Q. Well, what about -- what about documents?
18 Since this litigation has begun, have you destroyed
19 any documents that relate in any way to the issues
20 in this litigation?
21 A. No.
22 Q. Have you thrown away any documents that
23 relate in any way to this litigation?
24 A. No, not that I know of. I have not thrown
25 away documents.

<p style="text-align: right;">Page 369</p> <p>1 Q. Well, when you say not that you know of, what 2 do you mean by that?</p> <p>3 A. My house is a mess. I have things in piles. 4 There have been times when people have come and 5 changed my piles. Things have been thrown out, and 6 sometimes things have been thrown out that are 7 important to me. I do not have track of all my 8 papers.</p> <p>9 Q. You told us a few minutes ago that no one 10 came to your house to search for documents.</p> <p>11 A. Correct.</p> <p>12 Q. Have you searched through all of those piles 13 in your house for documents responsive to this 14 lawsuit?</p> <p>15 A. Yes.</p> <p>16 Q. When did you do that?</p> <p>17 A. I've done it on several occasions. I did it 18 just recently and -- I don't know -- probably there 19 was I imagine some discovery requests in the past 20 year or two.</p> <p>21 Q. And in your -- in your more recent searches 22 through these documents, have you found other 23 documents and turned them over?</p> <p>24 A. No. There are no other documents.</p> <p>25 Q. You testified that you took one course in</p>	<p style="text-align: right;">Page 371</p> <p>1 MR. SKOLNIK: Why don't we take five 2 minutes?</p> <p>3 MR. CAMPION: Sure. 4 (At this point, there was a short 5 recess.)</p> <p>6 THE VIDEOGRAPHER: This is the beginning 7 of Tape Number 6. The time is 4:17.</p> <p>8 BY MR. SKOLNIK:</p> <p>9 Q. Mr. Raniere, you have no personal knowledge 10 of discussions, if any, between Rick Ross and 11 Stephanie Franco relating to whether or not she had 12 a confidentiality agreement; isn't that right?</p> <p>13 A. Correct.</p> <p>14 Q. What material, if any, did the Dalai Lama's 15 representative review before agreeing to the program 16 that you're planning with the Dalai Lama?</p> <p>17 A. I don't know all the details. He went 18 through I believe a 16-day Intensive. I believe he 19 interviewed and spent time with people within the 20 organization. He interviewed me.</p> <p>21 Q. When did he interview you?</p> <p>22 A. I don't know, maybe a year ago.</p> <p>23 Q. And what did you discuss?</p> <p>24 A. Um, he asked all different things; and he's 25 also been involved in a lot of the discussions I've</p>
<p style="text-align: right;">Page 370</p> <p>1 neuro linguistic programming in the 1980s, is that 2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. Where did you take that course?</p> <p>5 A. In my home.</p> <p>6 Q. From whom?</p> <p>7 A. A woman named Lynn Stafford Clark.</p> <p>8 Q. She came to your home and taught just you, or 9 was it a group?</p> <p>10 A. No, it was a group.</p> <p>11 Q. Did you keep any materials from her course?</p> <p>12 A. No.</p> <p>13 Q. Did she give you any materials?</p> <p>14 A. Not that I know of.</p> <p>15 Q. Did you use any of the knowledge that you 16 gained from this course in your development of the 17 Rational Inquiry Method?</p> <p>18 A. That's a very broad question. If you believe 19 in the theory that in any one moment you use all of 20 the things that you've been exposed to, then yes. 21 Have I directly taken something from neuro 22 linguistic programming and put it into the Rational 23 Inquiry Method, no.</p> <p>24 THE VIDEOGRAPHER: Excuse me. We have 25 to change tapes.</p>	<p style="text-align: right;">Page 372</p> <p>1 had with the people from Mexico. We had a bunch of 2 people come up with Mexi -- from Mexico, and he was 3 in that where we're talking about the different ways 4 of working the peace movement down there. And I was 5 using him as an advisor in part because of his I 6 will say extreme experience.</p> <p>7 Q. In any of your discussions with the Dalai 8 Lama's representative, did you discuss any aspects 9 of the Rational Inquiry Method?</p> <p>10 A. I don't suspect so.</p> <p>11 Q. Do you recall whether you did or not?</p> <p>12 A. Not directly, but the conversations that I 13 do recall we did not.</p> <p>14 Q. But there are conversations that you don't 15 recall?</p> <p>16 A. Possibly.</p> <p>17 Q. And you testified yesterday that you're not 18 sure whether or not the Dalai Lama's representative 19 signed a confidentiality agreement, is that correct?</p> <p>20 A. Yes, but I asked Nancy, and she said she 21 believes he did.</p> <p>22 Q. She believes he did?</p> <p>23 A. Yes.</p> <p>24 Q. But you have no -- you have no knowledge of 25 that other than what Nancy told you?</p>

<p style="text-align: right;">Page 373</p> <p>1 A. Correct.</p> <p>2 Q. To your knowledge, has anyone ever been given</p> <p>3 access to parts of the Rational Inquiry Method or</p> <p>4 other NXIVM course material without signing a</p> <p>5 confidentiality agreement?</p> <p>6 A. That's correct. That's in part why I</p> <p>7 answered that I don't believe I discussed any of</p> <p>8 the Rational Inquiry Method with Lama Tenzin.</p> <p>9 Q. Let me -- let me ask my question again.</p> <p>10 To your knowledge, has anyone ever been</p> <p>11 given access to parts of the Rational Inquiry Method</p> <p>12 or other NXIVM materials without signing a</p> <p>13 confidentiality agreement?</p> <p>14 A. No.</p> <p>15 Q. No one under any circumstances?</p> <p>16 A. Correct.</p> <p>17 Q. I'm going to refer to the Exhibit that has</p> <p>18 been marked as Raniere-11.</p> <p>19 MR. CAMPION: This would be the</p> <p>20 Affidavit.</p> <p>21 THE WITNESS: Okay. Should I just take</p> <p>22 it?</p> <p>23 MR. CAMPION: No, that's my copy.</p> <p>24 THE WITNESS: I got it.</p> <p>25 (A discussion was held off the record.)</p>	<p style="text-align: right;">Page 375</p> <p>1 for optimal communication and decision making."</p> <p>2 Did I read that correctly?</p> <p>3 A. I believe so.</p> <p>4 Q. Is Rational Inquiry based at all on the ideas</p> <p>5 of Isaac Asimov?</p> <p>6 A. As I said, it's a two-handed question. You</p> <p>7 would say certainly it was inspired by, but Isaac</p> <p>8 Asimov did not to my knowledge exhibit Rational</p> <p>9 Inquiry.</p> <p>10 Q. But some of Rational Inquiry is inspired by</p> <p>11 or based upon Isaac Asimov's ideas, is that correct?</p> <p>12 A. I think that would be fair to say.</p> <p>13 Q. How did Isaac Asimov's ideas inspire and</p> <p>14 influence the theory and practice of Rational</p> <p>15 Inquiry?</p> <p>16 A. In Isaac Asimov's book there is a group</p> <p>17 called The Second Foundation who had optimized</p> <p>18 communication, so with a minimal amount of words or</p> <p>19 sounds or motions they could communicate very large</p> <p>20 amounts of information. I thought that was</p> <p>21 interesting that one could communicate more or less</p> <p>22 by how they spoke, what they -- how they moved. So</p> <p>23 I started playing with that idea of what is the true</p> <p>24 nature, if you will, or different nature of</p> <p>25 communication other than just the words.</p>
<p style="text-align: right;">Page 374</p> <p>1 Q. And for the record, you've already identified</p> <p>2 this as an Affidavit --</p> <p>3 A. Uh-huh.</p> <p>4 Q. -- that you signed.</p> <p>5 A. Yes.</p> <p>6 Q. And it's an Affidavit dated or sworn to on</p> <p>7 the 22nd day of August, 2003; is that right?</p> <p>8 A. Let me get to the page.</p> <p>9 August 22nd, 2003, yes.</p> <p>10 Q. Let me ask you to turn to Paragraph 9.</p> <p>11 A. (Witness complies.)</p> <p>12 Paragraph 9. I'm sorry.</p> <p>13 Q. And I'm going to read you some or all of the</p> <p>14 paragraph and then ask you some questions about it.</p> <p>15 "I discovered I had an exceptional aptitude</p> <p>16 for Mathematics and computers when I was 12. It was</p> <p>17 at the age of 12 I read The Second Foundation by</p> <p>18 Isaac Asimov and was inspired by the concepts on</p> <p>19 optimal human communication to start to develop the</p> <p>20 theory and practice of Rational Inquiry. This</p> <p>21 practice involves analyzing and optimizing how the</p> <p>22 mind handles data. It involves mathematical set</p> <p>23 theory applied in a computer programmatic fashion to</p> <p>24 processes such as memory and emotion. It also</p> <p>25 involves a projective methodology that can be used</p>	<p style="text-align: right;">Page 376</p> <p>1 Q. And how is that idea reflected in the</p> <p>2 Rational Inquiry Method?</p> <p>3 A. Well, as I started to examine human</p> <p>4 communications, I started to understand more and</p> <p>5 discover things. Those discoveries ultimately led</p> <p>6 to things within Rational Inquiry.</p> <p>7 Q. What concepts of Rational Inquiry did you</p> <p>8 develop at the age of 12?</p> <p>9 A. I don't know if I developed any of them at</p> <p>10 the age of 12. I think the precursors to what is</p> <p>11 Rational Inquiry today were started back then.</p> <p>12 Q. When you say the precursors were started back</p> <p>13 then, in what way were they started?</p> <p>14 A. I started to experiment with human</p> <p>15 communication, with the more programmatic aspects of</p> <p>16 human communication and also the more expressive,</p> <p>17 less programmatic aspects; examining things like</p> <p>18 free will and possibly why a human would behave a</p> <p>19 certain way or not. That curiosity ultimately led</p> <p>20 to the codification of what is known as Rational</p> <p>21 Inquiry.</p> <p>22 Q. These experiments that you began to do at the</p> <p>23 age of 12, did you tell anyone about them?</p> <p>24 A. Well, not -- I mean, for me to say over the</p> <p>25 past 30 years have I told anyone about any</p>

<p style="text-align: right;">Page 377</p> <p>1 experiments that I do, I certainly have.</p> <p>2 I had a friend that we played a game where</p> <p>3 we tried to communicate optimally to each other with</p> <p>4 minimal amounts of speech from the book. We did</p> <p>5 that for about a week. He became tired of it.</p> <p>6 Q. When you say "from the book," from what book?</p> <p>7 A. The Second Foundation.</p> <p>8 Q. Did you ever write down your thoughts or your</p> <p>9 experiments --</p> <p>10 A. I think over the years --</p> <p>11 Q. -- at this period?</p> <p>12 A. This period, no.</p> <p>13 Q. At some later period?</p> <p>14 A. Probably.</p> <p>15 Q. What do you remember writing down?</p> <p>16 A. I -- I mean, I've written many computer</p> <p>17 programs; and I've, you know, written many notes</p> <p>18 about my thoughts on different things and my</p> <p>19 thoughts on mathematics in particular.</p> <p>20 Q. What about your thoughts that became parts of</p> <p>21 the Rational Inquiry Method?</p> <p>22 A. You could say in some ways all of those</p> <p>23 thoughts were inspirational to the Rational Inquiry</p> <p>24 Method.</p> <p>25 Q. Well, beyond being inspirational, are any of</p>	<p style="text-align: right;">Page 379</p> <p>1 human behavior and thought.</p> <p>2 Q. And about how old were you when you did that?</p> <p>3 A. I don't know, 39 somewhere, whenever -- I had</p> <p>4 just done that months before I met Nancy.</p> <p>5 Q. You had just done what?</p> <p>6 A. Made that discovery.</p> <p>7 Q. What did you study at RPI?</p> <p>8 A. I studied some mathematics, some physics,</p> <p>9 some biology, some psychology, some philosophy, some</p> <p>10 music, some computer programming, some language;</p> <p>11 French.</p> <p>12 Q. Were any of the concepts that you learned at</p> <p>13 RPI used in Rational Inquiry?</p> <p>14 A. No, not directly.</p> <p>15 Q. What about indirectly?</p> <p>16 A. Yeah. I think RPI is a unique rec -- RPI --</p> <p>17 Rational Inquiry is a unique recipe of concepts that</p> <p>18 exist plus things that were discovered as</p> <p>19 combinations of those concepts.</p> <p>20 Q. So some of the concepts were used in Rational</p> <p>21 Inquiry?</p> <p>22 A. No.</p> <p>23 Q. Well, tell me again what you just told me.</p> <p>24 A. Okay. It depends how you define "used in."</p> <p>25 If you are -- I guess I would need you in</p>
<p style="text-align: right;">Page 378</p> <p>1 them embodied in the Rational Inquiry Method?</p> <p>2 A. No, because the Rational Inquiry Method was</p> <p>3 a -- a type of discovery that occurred from having</p> <p>4 many different events and then drawing a specific</p> <p>5 conclusion about how the basis elements of any</p> <p>6 behavior and human endeavor --</p> <p>7 THE WITNESS: Is it okay that I --</p> <p>8 MR. CAMPION: Go ahead and talk.</p> <p>9 THE WITNESS: Okay.</p> <p>10 Continuing...</p> <p>11 A. -- the basis elements of any human endeavor</p> <p>12 can be codified and maximized and the nature of how</p> <p>13 abstract mathematics could be utilized to help with</p> <p>14 human endeavors and athletic endeavors and mental</p> <p>15 endeavors and things like that.</p> <p>16 Q. And as you were developing Rational Inquiry,</p> <p>17 did you write down any of those conclusions you were</p> <p>18 drawing?</p> <p>19 A. I think it was more of a quick discovery, but</p> <p>20 probably not.</p> <p>21 Q. Did you keep them a secret?</p> <p>22 A. Well, once I made that discovery, yes.</p> <p>23 Q. Once you made what discovery?</p> <p>24 A. The understanding of how to take mathematics,</p> <p>25 if you will, and apply it in a practical sense to</p>	<p style="text-align: right;">Page 380</p> <p>1 part to define what you mean by "discovery" or "used</p> <p>2 in."</p> <p>3 I think that I learned to speak English and I</p> <p>4 used that in Rational Inquiry; and English is used</p> <p>5 in Rational Inquiry, but it's not Rational Inquiry</p> <p>6 as a discovery. English is not confidential. So</p> <p>7 like I use English, so I used things in mathematics,</p> <p>8 things in philosophy, all of my background to bear</p> <p>9 to create the discovery.</p> <p>10 Q. Let me ask you to look at Paragraph 11 of</p> <p>11 this Affidavit.</p> <p>12 A. (Witness complies.)</p> <p>13 Q. I'm going to read the first part of the</p> <p>14 paragraph.</p> <p>15 "I entered RPI just after my 17th birthday</p> <p>16 and started to take high level (PhD) graduate</p> <p>17 courses in Mathematics. These courses are normally</p> <p>18 reserved for advanced graduate school students. To</p> <p>19 my knowledge I was the first 17 year old to take</p> <p>20 advanced 600 level mathematics courses in RPI's then</p> <p>21 153 year history. I continued to develop Rational</p> <p>22 Inquiry and formalized a new method of computer</p> <p>23 programming which I called 'functional</p> <p>24 programming.'"</p> <p>25 A. Uh-huh.</p>

<p style="text-align: right;">Page 381</p> <p>1 Q. Did I read that correctly?</p> <p>2 Okay. You say, "I continued to develop</p> <p>3 Rational Inquiry."</p> <p>4 A. Yes.</p> <p>5 Q. What part of Rational Inquiry did you</p> <p>6 continue to develop?</p> <p>7 A. I would say all of the precursor concepts. I</p> <p>8 gained a deeper and deeper understanding of this</p> <p>9 mode of thinking.</p> <p>10 Q. When you say, "all of the precursor</p> <p>11 concepts," what precursor concepts are you referring</p> <p>12 to?</p> <p>13 A. Well, in this particular case, the things</p> <p>14 relating to functional programming and information</p> <p>15 processing; how input variables, first of all, in a</p> <p>16 computer relate to output variables and how the</p> <p>17 computer uses a set of three operations which are</p> <p>18 addition, comparison, and iteration to solve all the</p> <p>19 problems. So you have a problem, and you have three</p> <p>20 operations, and that starts to raise the question</p> <p>21 can you create other operations to solve a problem</p> <p>22 set.</p> <p>23 Q. Did you write -- well, did you tell anybody</p> <p>24 about your -- your thinking on this subject?</p> <p>25 A. On functional programming, I imagine. I know</p>	<p style="text-align: right;">Page 383</p> <p>1 Q. "This successfully reduced our system's</p> <p>2 search time by over 90%. I thereby refined and</p> <p>3 tested my model of how the human mind, with sense</p> <p>4 capability, compared to a computer and how the human</p> <p>5 mind, equipped with a motivationally driven</p> <p>6 projective mechanism, 'understood' and strategically</p> <p>7 made decisions."</p> <p>8 Did I read that correctly?</p> <p>9 A. Yes, I believe so.</p> <p>10 Q. When you say, "I thereby refined and tested</p> <p>11 my model," what model are you referring to?</p> <p>12 A. Understanding of not only how the human mind</p> <p>13 creates templates but how to solve problems,</p> <p>14 human-created problems. In the Gammi-Pi physics</p> <p>15 group, we had a tremendous amount of data, and we</p> <p>16 had to fit a certain type of graph to that data.</p> <p>17 And although it's in a 12-parameter space, you can</p> <p>18 look at it on a screen as a two-dimensional</p> <p>19 visualization.</p> <p>20 If the computer is searching -- if you were</p> <p>21 to imagine the space as a geometric object, it has</p> <p>22 all sorts of bumps and saddle points and things like</p> <p>23 that. A computer blindly looks in a systematic</p> <p>24 fashion. That systematic fashion is created by</p> <p>25 humans to go and find the optimal solution, but the</p>
<p style="text-align: right;">Page 382</p> <p>1 that I had actually written some functional</p> <p>2 programs.</p> <p>3 Q. Did you -- did you keep those programs a</p> <p>4 secret?</p> <p>5 A. No, the programs weren't kept a secret.</p> <p>6 Q. What, if anything, was kept a secret?</p> <p>7 A. My method of writing the programs. I worked</p> <p>8 for the Gammi-Pi physics group. We had a program</p> <p>9 that took 16 hours of CPU time to run and was</p> <p>10 something like 4,000 lines long. I wrote a</p> <p>11 functional program that took something like 6</p> <p>12 minutes and was 12 lines long.</p> <p>13 Q. And that was written down?</p> <p>14 A. The program was.</p> <p>15 Q. So what you kept a secret was how it is that</p> <p>16 you reduced it down --</p> <p>17 A. Can do such a thing.</p> <p>18 Q. Moving to Paragraph 12 of this Affidavit.</p> <p>19 I'm starting about four lines down, "At this time I</p> <p>20 noted that a human could often 'see' a data pattern</p> <p>21 quicker than a computer. So I created a visually</p> <p>22 driven computer system to allow for 'human</p> <p>23 intervention' in optimal parameter selection and</p> <p>24 curve fitting."</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 384</p> <p>1 human can look at a graph and see almost instantly</p> <p>2 just like a chess player can do, can rival -- not so</p> <p>3 much any more -- a computer. A computer does 400</p> <p>4 million moves in a second. Computer -- a human mind</p> <p>5 can do four moves in a second, yet the human mind</p> <p>6 can work in these ways as well as a computer, so the</p> <p>7 question was why. And I started to understand that</p> <p>8 more and more by working on a programmatic basis and</p> <p>9 applying aspects of human perception to that</p> <p>10 programmatic basis.</p> <p>11 Q. And all of that was part of your development</p> <p>12 of Rational Inquiry?</p> <p>13 A. Part of the journey.</p> <p>14 Q. Paragraph 13.</p> <p>15 "From 1982 to 1984 I worked as a teacher of</p> <p>16 computer science and computer programming through</p> <p>17 Public Management Systems, a state contractor. I</p> <p>18 created the curriculum, taught classes and</p> <p>19 interviewed, evaluated, sub-contracted other</p> <p>20 instructors to teach classes with my curriculum and</p> <p>21 methodology in Manhattan, Albany, Saratoga and</p> <p>22 Poughkeepsie. I also worked as an independent</p> <p>23 computer and business consultant. It was during</p> <p>24 this time, as a teacher of science, I studied how</p> <p>25 humans processed problems and learned. I refined my</p>

<p style="text-align: right;">Page 385</p> <p>1 learning and teaching methodology which I embodied 2 into a business plan called 'The Concept School' 3 later changed to 'The Life Learning Institute.'" 4 Did I read that correctly? 5 A. Yes. 6 Q. Okay. 7 A. I believe so. 8 Q. Is the -- is the business plan that's called 9 The Concept School and later changed to The Life 10 Learning Institute the foundation for Rational 11 Inquiry? 12 A. No. 13 Q. Is it the foundation for NXIVM? 14 A. No. 15 Q. How does it differ from Rational Inquiry? 16 A. It doesn't use the Rational Inquiry Method 17 at all. It was merely a way of delivering course 18 material that is for adult education in a way that 19 was more efficient. What it did was -- can I 20 explain this? 21 Q. Of course. 22 A. Okay, 'cause it's a little long. I'm sorry. 23 The Socratic method is a method of teaching 24 that hasn't undergone a lot of changes over, say, 25 the past few thousand years. When a teacher teaches</p>	<p style="text-align: right;">Page 387</p> <p>1 doesn't necessarily mean you're a good teacher. In 2 part, teaching is entertainment, if you will, 3 keeping the students' attention, enrolling, 4 inspiring the students' interest in the subject. 5 I know you hear often that people have been 6 inspired by great teachers. So the question is, 7 well, if you were to take teachers and instead of 8 just hiring them because they knew the subject, look 9 to see who could offer curriculum and lecture after 10 lecture keep it entertaining, more like someone who 11 had the ability to act or entertain. And if you 12 combined it with a different way of scheduling the 13 courses, you could provide a unique adult education 14 program. 15 Q. Is there any difference between The Concept 16 School and The Life Learning Institute? 17 A. No, just a difference in I think one person 18 that was involved, but it was a better name. People 19 liked the name better, Life Learning Institute. 20 Q. How many business plans did you prepare for 21 the Concept School? 22 A. One. 23 Q. And what did you do with the plan? 24 A. Showed to it some investors. 25 Q. Paragraph 17 you say, "I explored what I</p>
<p style="text-align: right;">Page 386</p> <p>1 the class, it is incumbent upon the teacher to be 2 able to get the information across somehow; and 3 there has been an art of teaching. 4 The way curriculum and one example that I 5 gave in the concept school -- let's suppose you were 6 learning calculus, and instead of offering Calculus 7 1 in ten sections all starting at the same time, 8 suppose we were to stagger them. So you could take 9 Lecture 1, and you could take Lecture 1 again if you 10 missed it, and you could take Lecture 1 again and 11 then 2 and maybe go to 3, 4. And then if you had 12 trouble in 4, you could go to 4, back to 3. 13 This would allow you an ability to not worry 14 about -- so much about I must learn the material 15 here. If I'm stuck on this material, I can take the 16 course again. And from the teacher's perspective, 17 the teacher always has to teach to the bottom 20 18 percent of the class; and if the bottom 20 percent 19 of the class can always take the course again, the 20 teacher can actually teach in a more accelerated 21 fashion. So by allowing students the liberty to go 22 and take courses in a different organized fashion, 23 they can go and repeat things and learn better and 24 the teachers could also learn better. Additionally, 25 to teach -- to be -- to know the information well</p>	<p style="text-align: right;">Page 388</p> <p>1 termed different types of learning: For example, 2 you can't really learn to ski out of a book; you 3 can't replace physical or experiential learning with 4 intellectual learning. Motivation had a strong 5 experiential learning component and I developed 6 tools to teach it." 7 A. Uh-huh. 8 Q. Did I read that correctly? 9 A. Yes, I believe so. 10 Q. What is the "it" in the last sentence? "I 11 developed tools to teach it"? 12 A. The experiential learning component of 13 motivation. I started to understand that and 14 developed tools to help isolate it and help teach 15 it. 16 Q. And are those tools components of the 17 Rational Inquiry Method? 18 A. They're precursors. 19 Q. Did you publish them in any way? 20 A. No. 21 Q. Did you tell anyone about them? 22 A. No, not directly. I have taught people, for 23 example, to be -- to do certain things that help in 24 motivation. For example, as silly as it sounds, if 25 someone wants to have a certain state and it's tied</p>

<p style="text-align: right;">Page 389</p> <p>1 to a certain musical piece, playing that piece can 2 allow through state dependent learning to increase 3 that motivation. But the question has always been 4 when someone does an activity what is the motivator 5 underneath it and how do you harness that 6 motivation. So I've taught -- I've told people 7 things like that but nothing relating to the 8 Rational Inquiry Method there. 9 Q. Well, when you -- when you told people things 10 like that, did they sign a confidentiality 11 agreement? 12 A. Actually, most of them did, I believe, if 13 not all; but I don't consider that part of the 14 Rational Inquiry Method. 15 Q. Why not? 16 A. Well, 'cause it's a precursor to it. It led 17 to the discovery and it led to this tool set that we 18 call Rational Inquiry today. It was not that tool 19 set, similar to if I'm starting to learn about tools 20 and I have a hammer and I have a saw and I have a 21 chisel, and one day I discover the screwdriver. I 22 cannot say that the hammer, the saw and the chisel 23 are the screwdriver. It did lead to its discovery, 24 but the screwdriver has unique traits. 25 Q. Does it provide a window to the hammer and</p>	<p style="text-align: right;">Page 391</p> <p>1 as price clubs, this was similar, but it was a 1800 2 number membership. 3 Q. What did it sell? 4 A. Well, Consumers' Buyline was a membership and 5 through it you were able to get -- it was over a 6 million products. It was almost every book in 7 print, it was electronics, circuits. You were able 8 to get groceries delivered to your door. We had a 9 grocery catalog that came out every two months. We 10 had special deals on things like luggage and things 11 like cassette tape recorders or the cassettes that 12 go in. 13 We had a special company called Direct 14 Buyline, which was a subsidiary which went to 15 manufacturers and got special either crate deals or 16 large discount deals which we passed on to our 17 members at no additional cost. So what Consumers' 18 Buyline was like was the Consumer Reports -- it's as 19 if you had Consumer Reports but was also offered the 20 ability to buy the object at the price stated with 21 the lowest price guarantee. 22 Q. Did -- did your experience with Consumers' 23 Buyline influence your development of Rational 24 Inquiry and NXIVM? 25 A. I'm sure.</p>
<p style="text-align: right;">Page 390</p> <p>1 the chisel? 2 A. It can, but if they are precursors, as 3 opposed to once the discovery exists actually 4 viewing the discovery. 5 Q. How do you define precursor? 6 A. Something that comes before. 7 Q. In the context that you're using it, what are 8 the precursors to the Rational Inquiry Method? 9 A. Understandings of human emotion, 10 understandings of human motivation, understandings 11 in mathematics, how mathematics relates to human 12 thoughts. 13 Q. What was Consumers' Buyline? 14 A. Consumers' Buyline was a company that I was 15 the primary owner of and CEO. 16 Q. What did it do? 17 A. It did severalfold. It was what some people 18 termed a multi-level marketing company where people 19 had an opportunity to have home-based businesses and 20 sell a product. On the other hand, the product was 21 a membership. By bringing a coalition of people 22 together, and in this case quite a large coalition, 23 we were able to negotiate discount buying 24 opportunities so it was sort of the -- what a lot of 25 people can do now online and even what people know</p>	<p style="text-align: right;">Page 392</p> <p>1 Q. How? 2 A. I had contact with many people in many 3 different contexts as a head of a large marketing 4 organization, as a CEO of a company with many 5 employees. For example, as a CEO of the company, I 6 had some almost 200 employees. The question is what 7 can you do to make their work meaningful. What can 8 you do to make the company serve the employees and 9 foster a type of community as much as possible. 10 I also had a lot of opportunity to help 11 resolve ethical disputes amongst marketers and 12 amongst different people like that. 13 Q. So what -- what parts of your development of 14 Rational Inquiry came from Consumers' Buyline? 15 A. I would say it probably furthered a lot of my 16 understanding. I learned a lot about ethics. I 17 learned a lot about business. I learned a lot about 18 motivation of why people do things or not. I think 19 all of my understandings on those levels were 20 furthered by this experience. 21 Q. And are all of those understandings part of 22 the Rational Inquiry Method? 23 A. No. They lead up to the Rational Inquiry 24 Method. 25 Q. How were --</p>

<p style="text-align: right;">Page 393</p> <p>1 A. They were necessary for me to create the 2 Rational Inquiry Method. 3 Q. Let me ask you to turn to Paragraphs 25 and 4 26. 5 A. (Witness complies.) 6 Q. Let me read them into the record, and then I 7 have several questions about them. 8 Paragraph 25 says, "In Mathematics, all 9 things are proven based on axioms and a step by step 10 systematic construction. Computers work the same 11 way. To program a computer one must first 12 understand the axioms of the computer language, and 13 then the step by step systematic construction of the 14 problem-solution methodology. Finally, one must 15 construct the problem-solution methodology in a 16 step by step fashion using the axioms of the 17 language. I discovered the human mind works the 18 same way and I formalized the process." 19 "This process involved treating each word or 20 part in a communication as a mathematical set. As 21 such, the operations of set theory and Boolean logic 22 could be utilized. Each word is seen as both a 23 general objective representation and a highly 24 specific subjective representation." 25 A. Uh-huh.</p>	<p style="text-align: right;">Page 395</p> <p>1 A. Some of the coursework is a product of 2 Rational Inquiry. 3 Q. Is there some coursework at NXIVM that is not 4 a product of Rational Inquiry? 5 A. I think there are de -- I think there are a 6 few sections that are defined as such. 7 Q. When you say they're defined as such, defined 8 as such by whom? 9 A. Within the module I believe it states where 10 they came from. 11 Q. And that they came from something other than 12 Rational Inquiry? 13 A. Yeah. I believe there's a Birdwhistle 14 (phon.) Or whatever the person's name is that did a 15 study and a few things like that. 16 Q. Well, what modules are taught by NXIVM that 17 are not based on Rational Inquiry? 18 A. Communication/At Cause has certain parts of 19 it that have been taken -- that are based not on 20 Rational Inquiry but utilizing Rational Inquiry have 21 been enhanced. 22 Q. But they utilize Rational Inquiry? 23 A. Yes. 24 Q. You testified yesterday that the Rational 25 Inquiry Method is a tool. It's theoretical</p>
<p style="text-align: right;">Page 394</p> <p>1 Q. "By precisely choosing exact words in precise 2 orders one could communicate in a far deeper and 3 measurable way. And, similar to mathematical 4 proofs, the precise questions and their order are of 5 ultimate importance. In some ways it is similar to 6 saying a person cannot walk before they crawl -- the 7 order is essential." 8 A. Yes. 9 Q. Did I read all that correctly? 10 A. Yes. 11 Q. Is -- are the ideas that you are expressing 12 in Paragraphs 25 and 26 the basis or foundation of 13 Rational Inquiry? 14 A. Getting closer. 15 Q. Are they the basis of NXIVM? 16 A. I think NXIVM has developed not only beyond 17 that but is different than Rational Inquiry. 18 Q. How is NXIVM different from Rational Inquiry? 19 A. NXIVM is a company. Rational Inquiry is a 20 method, if I were to describe it that way. NXIVM 21 has a lot of components that are not Rational 22 Inquiry. 23 Q. Well, referring to the courses that NXIVM 24 teaches, how -- how does Rational Inquiry differ 25 from the coursework at NXIVM?</p>	<p style="text-align: right;">Page 396</p> <p>1 procedures involved in the creation of certain 2 results. Do I have that right? 3 A. Say the last few -- the last sentence again. 4 Q. That it's theoretical procedures involved in 5 the creation of certain results. 6 A. Yes. 7 Q. And you told us that the results include 8 the ordering of questions and the ordering of 9 philosophical concepts, is that right? 10 A. Uh-huh. Yes. 11 Q. You also testified that creating the 12 questions in a module is like assembling the pieces 13 of a puzzle, and the questions can only be 14 interlocked in a certain way. 15 Do I have that right? 16 A. To a great extent. In other words, often 17 they can be interlocked in only one way; but there 18 are limitations as to how the different questions 19 and words can be interlocked. 20 Q. Okay, and -- and is it true that you believe 21 that the nature of that organization is a NXIVM 22 trade secret? 23 A. The nature of how that organization is 24 derived. 25 Q. Is a trade secret?</p>

<p style="text-align: right;">Page 397</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Do -- do the Martin or Hochman</p> <p>3 articles reveal or disclose the ordering of</p> <p>4 questions?</p> <p>5 A. I believe it does, especially the Martin</p> <p>6 article.</p> <p>7 Q. How does it do that?</p> <p>8 A. Well, the products of Rational Inquiry can</p> <p>9 also be used to determine Rational Inquiry much like</p> <p>10 a -- a footprint in a sand can be used to figure out</p> <p>11 what the footprint is. The questions themselves,</p> <p>12 the order of the words may not be -- they are a</p> <p>13 product of Rational Inquiry, but utilizing those</p> <p>14 things people can deduce Rational Inquiry, possibly</p> <p>15 recreate many of the trade secrets of Rational</p> <p>16 Inquiry.</p> <p>17 Q. So, once again, is it -- is it fair to say</p> <p>18 that the articles themselves don't disclose the</p> <p>19 actual ordering of questions in print but that you</p> <p>20 think that someone might be able to infer the</p> <p>21 ordering of questions based upon the things that the</p> <p>22 articles do say?</p> <p>23 A. No. The articles do disclose the ordering of</p> <p>24 questions.</p> <p>25 Q. What questions -- what ordering -- what</p>	<p style="text-align: right;">Page 399</p> <p>1 (A discussion was held off the record.)</p> <p>2 A. Do you want me to read these articles start</p> <p>3 to finish and --</p> <p>4 Q. Well, you've read them pretty closely in the</p> <p>5 last couple of days. I want you to try to tell me</p> <p>6 where you think the articles disclose the ordering</p> <p>7 of philosophical concepts.</p> <p>8 A. Okay. I will say that when you say "disclose</p> <p>9 the ordering," there's one thing to directly</p> <p>10 disclose it, which I believe they do. There is also</p> <p>11 indirectly disclose it, which are ways I may not be</p> <p>12 able to contemplate sitting here reading it because</p> <p>13 for some --</p> <p>14 Q. Let's -- I'm sorry.</p> <p>15 A. -- for someone who is motivated to solve the</p> <p>16 problem of finding it out they well could by this</p> <p>17 disclosure.</p> <p>18 Q. Let's focus on direct disclosure.</p> <p>19 A. Okay.</p> <p>20 Q. Which one are you looking at first?</p> <p>21 A. Raniere-8, A Critical Analysis of Executive</p> <p>22 Success Programs.</p> <p>23 So on the first article, without going into a</p> <p>24 lot of detail, there are things referenced with page</p> <p>25 numbers in the module -- the manual and dates. And</p>
<p style="text-align: right;">Page 398</p> <p>1 questions are disclosed?</p> <p>2 A. I believe in the Money module, the order of</p> <p>3 concepts and questions, projective questions which</p> <p>4 is not as order dependent but were dependent within</p> <p>5 the order. I believe those things were quoted.</p> <p>6 Q. Anything else?</p> <p>7 A. Most of the quoted stuff that has questions</p> <p>8 involved and even some of the stuff that does not.</p> <p>9 Q. Do -- do the Martin and Hochman articles</p> <p>10 reveal or disclose the ordering of philosophical</p> <p>11 concepts?</p> <p>12 A. I believe so.</p> <p>13 Q. How?</p> <p>14 A. In the Money module I believe it specifically</p> <p>15 diagrams out the different concepts addressed and</p> <p>16 the order.</p> <p>17 Q. The Money module again?</p> <p>18 A. I -- I think some of the others, I believe</p> <p>19 also.</p> <p>20 Q. You want to -- you want to look at the</p> <p>21 articles and tell me what else you think discloses</p> <p>22 the ordering of philosophical concepts?</p> <p>23 A. Okay. Can you -- what are they?</p> <p>24 Q. I think they are 5, 6 and 8.</p> <p>25 A. 5, 6 and 8.</p>	<p style="text-align: right;">Page 400</p> <p>1 whenever you're copying parts of a manual and</p> <p>2 putting them in, if you start to put the page</p> <p>3 references of where the paragraphs came from, you</p> <p>4 start to say what the order of the manual is.</p> <p>5 I also know that in some of these things</p> <p>6 the modules are specifically not only referenced,</p> <p>7 but their order within a series is referenced. I</p> <p>8 can continue to get more direct examples, but there</p> <p>9 are.</p> <p>10 Q. Well, tell me what you mean by the order is</p> <p>11 referenced.</p> <p>12 A. Okay. For example --</p> <p>13 MR. McGUIRE: We're talking about what</p> <p>14 now?</p> <p>15 A. -- if you go to Raniere-6.</p> <p>16 MR. McGUIRE: 6.</p> <p>17 Q. Oh, we've moved to Raniere-6? I thought you</p> <p>18 were starting with Raniere-8.</p> <p>19 A. I did. Do you want me to go to Raniere-8</p> <p>20 first?</p> <p>21 Q. No, I just wanted to know which one you were</p> <p>22 talking about.</p> <p>23 A. Okay. Raniere-6 because I think it's</p> <p>24 clearer. I'd would be a bad driver. I shift</p> <p>25 everything around.</p>

<p style="text-align: right;">Page 401</p> <p>1 On the first page it says "Phone tree," and 2 it says 12/2000, which is the Intensive manual it 3 comes from, Page 4. 4 And the next page at the very top it says, "I 5 will not speak of them, or in any way give others 6 knowledge of them." 7 That's 12 Point Mission Statement 4th Comment 8 -- 4th Point of 12 points. 9 Next paragraph, "Arranging for Coaching 10 Support" in quotes. It goes through specifically 11 quoting the order of the different steps. 12 And then it is Page 1, Number 2. 13 Now, the next is it has the Money module. It 14 says "Concepts presented," and it specifically 15 delineates eight concepts in order and says this is 16 Page 2, Number 3 from the Money module. 17 Similar things like this. 18 Q. Well, let me ask you this. You referred to 19 the Phone tree, and you said "12/2000" refers to the 20 Intensive manual. 21 The article doesn't say that it refers to the 22 Intensive manual, does it? 23 A. The other article does. 24 Q. No, I'm talking about this article. 25 A. Oh. No, this article does not. I don't</p>	<p style="text-align: right;">Page 403</p> <p>1 A. Yes. 2 Q. Do you consider those philosophical concepts? 3 A. Well, let me read them. 4 MR. McGUIRE: Where are you, Peter? 5 MR. SKOLNIK: I'm on Page -- the second 6 page of Raniere-6, "Arranging for Coaching Support." 7 MR. McGUIRE: Thank you. 8 Continuing... 9 A. I think they represent certain things that 10 are philosophical concepts in Word. I don't think 11 -- how would you define something representing a 12 philosophical concept in Word? 13 Q. Well, happily, I'm not answering questions 14 today. I'm not sure that I understand your 15 question, but, anyway -- 16 A. Well, I misunderstood your question maybe. 17 Q. Let me -- let me ask you a different question 18 about the articles. 19 Do the articles disclose how to apply the 20 tool of the Rational Inquiry Method to create 21 certain results? 22 A. I think they might indirectly. 23 Q. Indirectly? 24 A. Yeah, and might directly, depending on how 25 well they were studied.</p>
<p style="text-align: right;">Page 402</p> <p>1 believe it does. It might in the back. 2 Q. And it doesn't tell you what was on Pages 3 3 or Pages 5, does it? 4 A. Hold on a second. Let me see if it -- I 5 don't think he put a Bibliography on this article. 6 Right now I don't see this as saying what's 7 on 3 -- Page 3 or Page 5, that is correct. 8 Q. And the reference to the 12 Point Mission 9 Statement, there's nothing that tells you what 10 Points 1, 2, 3 or 5 are. It's just this is Point 4, 11 right? 12 A. In this particular context, yes, but I 13 believe he -- out of the 12 points, I think he 14 recopies 7 of them. 15 Q. Okay. But this doesn't tell you also where 16 the 12 Point Mission Statement fits in relation to 17 the Intensive manual or to Rules and Regulations, 18 does it? 19 A. No. That's seemingly correct, yes. 20 Q. All right. You want to direct me to -- oh, 21 and one other -- one other point. 22 The specifications under "Arranging for 23 Coaching Support" -- 24 A. Which page? I'm sorry. 25 Q. Second page.</p>	<p style="text-align: right;">Page 404</p> <p>1 Q. Well, what do you mean that whether or not 2 they do so directly depends upon how well they're 3 studied? Either they do so directly or they don't. 4 A. Well, if I look at, for example, a murder 5 mystery and I -- 6 Q. Can you talk about the articles? 7 MR. McGUIRE: Well, why don't you let 8 him finish the answer. 9 MR. SKOLNIK: Because he's not being 10 responsive to the question. 11 MR. McGUIRE: That is -- you wait until 12 the end of the answer, not during the answer. 13 MR. CAMPION: Okay. Could you have the 14 question repeated, please. 15 (The following was read back by the 16 reporter: 17 "Can you talk about the articles?") 18 THE REPORTER: Did you want me to read 19 further back? 20 MR. CAMPION: That's the question. 21 Okay. You can answer the question. 22 Continuing... 23 A. What do you want me to say about the 24 articles? 25 Q. How they disclose directly the ways in which</p>

<p style="text-align: right;">Page 405</p> <p>1 the tools create certain results.</p> <p>2 A. Well, depending on the level of depth</p> <p>3 with which you read an article, we all have</p> <p>4 different understandings. A person that reads an</p> <p>5 article who is maybe not as well versed, maybe not a</p> <p>6 competitor, maybe not as intelligent, maybe not as</p> <p>7 good a reader will gather certain information from</p> <p>8 the article. Someone who has deeper compl --</p> <p>9 comprehension will gather more and even on a deeper</p> <p>10 level will gather logical implications that are</p> <p>11 absolute within the article. And what I was saying</p> <p>12 before, you can see a murder mystery and although</p> <p>13 the murder mystery doesn't say who did it, the</p> <p>14 murder mystery implies absolutely who did it so</p> <p>15 that's -- those fall in class of direct.</p> <p>16 Q. Was that sentence finished?</p> <p>17 A. Yes. I'm sorry. Those fall in the class of</p> <p>18 direct, if you will, ascertaining or transmission of</p> <p>19 the information.</p> <p>20 Q. In Paragraphs 25 and 26 that we just looked</p> <p>21 at, you described the process of programming a</p> <p>22 computer.</p> <p>23 A. Is this Ranieri-11?</p> <p>24 Q. Yes.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 407</p> <p>1 to duplicate and teach my model."</p> <p>2 Did I read that correctly?</p> <p>3 A. I believe so.</p> <p>4 Q. The model that you're referring to when you</p> <p>5 say I interviewed hundreds of people before I found</p> <p>6 the right person to duplicate and teach my model,</p> <p>7 what model were you referring to?</p> <p>8 A. That was the beginnings of Rational Inquiry.</p> <p>9 I think even some of the trade secrets that now</p> <p>10 exist a few of them might have been developed at</p> <p>11 that time.</p> <p>12 Q. And did you discuss those trade secrets with</p> <p>13 some of these hundreds of people that you</p> <p>14 interviewed?</p> <p>15 A. Absolutely not.</p> <p>16 Q. Who were some of the people that you</p> <p>17 interviewed?</p> <p>18 A. People that I had come in contact with</p> <p>19 through a company called National Health Outlet,</p> <p>20 even people I had come in contact with through</p> <p>21 Consumers' Buylne, different people who I knew not</p> <p>22 only who were friends but who were different</p> <p>23 professionals.</p> <p>24 Q. And you were interviewing these people</p> <p>25 specifically to find someone to duplicate and teach</p>
<p style="text-align: right;">Page 406</p> <p>1 Q. You described the process of programming a</p> <p>2 computer. You state that the human mind works the</p> <p>3 same way as a computer, and you claim that you</p> <p>4 formalized the process; is that right?</p> <p>5 A. Uh-huh.</p> <p>6 Q. So Rational Inquiry as practiced by NXIVM is</p> <p>7 a process for programming the human mind?</p> <p>8 A. That's part. You -- you can call it</p> <p>9 programming, deprogramming, yes.</p> <p>10 Q. So NXIVM programs its students?</p> <p>11 A. To a degree, yes.</p> <p>12 Q. Paragraph 27, "My new found mode of</p> <p>13 communication, when added to my projective model,</p> <p>14 allowed a person to understand others on a far</p> <p>15 deeper level. It enabled a person to find a common</p> <p>16 understanding with others and to logically build a</p> <p>17 belief system that matched a person's subjective</p> <p>18 world -- highly individual yet consistent. Using</p> <p>19 this model people seemed to understand themselves</p> <p>20 and each other better. They understood their</p> <p>21 decisions and in so doing often derived a sense of</p> <p>22 self-determinism. In short, their motivation was</p> <p>23 redirected from fear generated to objective</p> <p>24 generated. Over the next 7 years I would interview</p> <p>25 hundreds of people before I found the correct person</p>	<p style="text-align: right;">Page 408</p> <p>1 your model?</p> <p>2 A. To teach my model to, yes, and then to see if</p> <p>3 it was something that was duplicatable.</p> <p>4 Q. And you were trying to find someone to whom</p> <p>5 you could teach your model and have it be duplicated</p> <p>6 without talking about your model, is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. Who was the correct person?</p> <p>9 A. Nancy Salzman.</p> <p>10 Q. Paragraph 28 -- well, let me go back for a</p> <p>11 minute.</p> <p>12 What convinced you that Nancy Salzman was the</p> <p>13 correct person?</p> <p>14 A. Not only her background and her experience,</p> <p>15 but I spent a number of days meeting with her. We</p> <p>16 were going to meet for an hour. I don't know how</p> <p>17 long it was. We met many hours several days in a</p> <p>18 row, and I believed that she had not only the</p> <p>19 background but the personality and what I believe</p> <p>20 the value set to do this and also a willingness.</p> <p>21 Q. What was the value set that you were looking</p> <p>22 for?</p> <p>23 A. I believe she was honest. I believe she was</p> <p>24 hardworking.</p> <p>25 Q. Anything else?</p>

<p style="text-align: right;">Page 409</p> <p>1 A. Someone that I felt comfortable with.</p> <p>2 Q. Paragraph 28 reads in part, "In 1991, a paper</p> <p>3 I wrote was circulated throughout my industry. It</p> <p>4 utilized axiomatic first principles and a logical</p> <p>5 proof framework to 'debunk' many of the practices</p> <p>6 within the industry."</p> <p>7 A. Uh-huh.</p> <p>8 Q. I read that correctly?</p> <p>9 A. I believe so.</p> <p>10 Q. What was the name of the paper you wrote?</p> <p>11 A. I remembered yesterday as I was saying this,</p> <p>12 I believe it was referred to informally as the White</p> <p>13 Paper.</p> <p>14 Q. And how was it circulated?</p> <p>15 A. Some marketers ended up copying it and</p> <p>16 circulating it.</p> <p>17 Q. What ideas did the paper include?</p> <p>18 A. Relating to multi-level marketing, the</p> <p>19 fallacies of multi-level marketing, and a type of</p> <p>20 lay analysis of different marketing materials,</p> <p>21 pyramid schemes. I think it even went on to explain</p> <p>22 the nature of a pyramid scheme of effort, Ponzi</p> <p>23 schemes, although I'm not sure if those were</p> <p>24 included in the initial White Paper.</p> <p>25 THE VIDEOGRAPHER: Excuse me. We have</p>	<p style="text-align: right;">Page 411</p> <p>1 Did any part of the paper talk about your</p> <p>2 model?</p> <p>3 A. No.</p> <p>4 Q. Did any part of the paper contain any aspects</p> <p>5 of the Rational Inquiry Method?</p> <p>6 A. No.</p> <p>7 Q. Have a look at Paragraphs 36 and 37.</p> <p>8 A. (Witness complies.)</p> <p>9 Q. Paragraph 36 says, "The first most</p> <p>10 fundamental step in creating a company is the</p> <p>11 precise determination of the guiding principles on</p> <p>12 which it is built -- a mission statement.</p> <p>13 Everything must be based on and flow from this</p> <p>14 ethic. For our success school, I felt it was</p> <p>15 necessary to start with a philosophical statement</p> <p>16 of what success is (point 1 of the 12 point Mission</p> <p>17 Statement) then have the rest of the Mission</p> <p>18 Statement follow from there."</p> <p>19 "I searched my life experience and wrote the</p> <p>20 copyrighted 12 point Mission Statement that was the</p> <p>21 basis of our company, technology and education.</p> <p>22 When someone signs up for a program, they sign a</p> <p>23 confidentiality agreement. The first module they</p> <p>24 take is 'Rules and Rituals.' Within this module</p> <p>25 they learn of the 12 point Mission Statement. At</p>
<p style="text-align: right;">Page 410</p> <p>1 to change tapes.</p> <p>2 We're back on the record. The time is</p> <p>3 5:17.</p> <p>4 BY MR. SKOLNIK:</p> <p>5 Q. Were you in the middle of an answer?</p> <p>6 A. I'm not sure.</p> <p>7 MR. SKOLNIK: Can you read back the last</p> <p>8 testimony?</p> <p>9 MR. McGUIRE: Read the question, too, so</p> <p>10 we'll know. Read the question, also.</p> <p>11 (The following was read back by the</p> <p>12 reporter:</p> <p>13 "QUESTION: What ideas did the paper</p> <p>14 include?</p> <p>15 ANSWER: Relating to multi-level</p> <p>16 marketing, the fallacies of multi-level marketing,</p> <p>17 and a type of lay analysis of different marketing</p> <p>18 materials, pyramid schemes. I think it even went on</p> <p>19 to explain the nature of a pyramid scheme of effort,</p> <p>20 Ponzi schemes, although I'm not sure if those were</p> <p>21 included in the initial White Paper.")</p> <p>22 A. That's the --</p> <p>23 Q. Was that it?</p> <p>24 A. Yes.</p> <p>25 Q. Was the paper -- withdrawn.</p>	<p style="text-align: right;">Page 412</p> <p>1 that point, if they find any of the premises</p> <p>2 disagreeable, they can have their money refunded</p> <p>3 without further obligation except for the terms of</p> <p>4 the confidentiality agreement."</p> <p>5 Did I read that correctly?</p> <p>6 A. There is a parenthetic expression on the end</p> <p>7 of Clause 36 that says in my copy, "(See Appendix D</p> <p>8 for protective procedures)."</p> <p>9 Is that on yours?</p> <p>10 Q. Yes, it is but I'm not -- I'm not reading.</p> <p>11 A. No. I just wanted to be sure that it was</p> <p>12 accurate.</p> <p>13 Q. But other than that, I read it correctly?</p> <p>14 A. I believe so.</p> <p>15 Q. All right. And I think you've already told</p> <p>16 us that you consider the 12 Point Mission Statement</p> <p>17 to be a trade secret, is that right?</p> <p>18 A. I don't know if I said that.</p> <p>19 Q. Well, do you consider the 12 Point Mission</p> <p>20 Statement to be a trade secret?</p> <p>21 A. I think that it contains windows into trade</p> <p>22 secrets. I don't know if any written expression</p> <p>23 except for even maybe a formula -- I don't know</p> <p>24 enough about trade secrets. I do consider it</p> <p>25 secret. I do consider it essential.</p>

<p style="text-align: right;">Page 413</p> <p>1 Q. Well, using -- using your definition of trade 2 secret, the one that -- the one that you gave us 3 yesterday. We were -- we were working with your 4 definition of trade secret yesterday, and I want to 5 be sure we're talking about the same thing today. 6 I believe you told us that a trade secret is 7 something we believe is unique that we keep as a 8 secret and if it were not kept secret would be a 9 disadvantage to us. 10 A. I believe -- 11 Q. Do I have that right? 12 A. I believe the Mission Statement falls into 13 that. 14 Q. Okay. Was the development of the 12 Point 15 Mission Statement the most fundamental step in 16 creating ESP and NXIVM? 17 A. The most fundamental? 18 Q. Well, in Paragraph 36 you say, "The first 19 most fundamental step in creating a company." 20 A. Right. That doesn't mean it's the most 21 fundamental, but when you're taking first steps, the 22 first most fundamental step -- I don't know if it's 23 the most fundamental thing of all, but it's 24 certainly very fundamental. 25 Q. Okay. Is -- is everything in NXIVM based on</p>	<p style="text-align: right;">Page 415</p> <p>1 trade secrets which have been derived after the 2 point of the Mission Statement. 3 Q. Okay. But referring just to the 12 Point 4 Mission Statement -- 5 A. Uh-huh. 6 Q. -- would you agree that if the 12 Point 7 Mission Statement was posted on NXIVM's website, 8 then it as written is not a trade secret? 9 A. Well, it's not secret in the same way if it 10 was downloaded by anyone, I imagine. 11 Q. Let me ask you again. 12 A. All right. I'm being specific because when 13 you post something on the web, if nobody looks at 14 it, it hasn't been downloaded. It hasn't been 15 viewed so -- but if it was posted on the web and if 16 it indeed was downloaded, then that becomes some 17 form of more public knowledge. 18 Q. If it was downloaded or even if it was just 19 viewed, is that right? 20 A. Well, but what I mean by -- to view it -- in 21 my mind, to view it means you've taken the package 22 from the website and put it on your computer. I'm 23 sorry. 24 Q. And you testified yesterday that you don't 25 know of any other modules that have been posted on</p>
<p style="text-align: right;">Page 414</p> <p>1 the 12 Point Mission Statement? 2 A. No. 3 Q. Well, what do you mean in Paragraph 36 when 4 you say, "Everything must be based on and flow from 5 this ethic"? 6 A. It flows from this ethic. Depending on how 7 you define "based on" -- 8 Q. Well, it's your word, Mr. Ranieri. 9 A. I understand. As far as what I am saying 10 here is that this is the foundational principle and 11 principles from which everything else is ultimately 12 derived. So, yes, I guess in answer to your 13 question, in some way, shape or form all ESP, NXIVM 14 flows from this. 15 Q. Now, you told us yesterday that you 16 understood that the 12 Point Mission Statement may, 17 in fact, have been posted on NXIVM's website; right? 18 A. Uh-huh. 19 Q. And you testified that if it appeared on the 20 website you would acknowledge that it's not a trade 21 secret, right? 22 A. That part of it. 23 Q. Well, if all of it appeared on the website -- 24 A. Yes, but where -- it in itself, but there are 25 also the trade secrets which it implies and the</p>	<p style="text-align: right;">Page 416</p> <p>1 the internet. 2 A. Correct. 3 Q. But would you make the same acknowledgement 4 about any other NXIVM material that NXIVM or its 5 representatives posted on the internet? 6 A. Yeah. If people can publicly access them, 7 they've lost certainly a degree of secrecy. 8 Q. Okay. Would you acknowledge that you don't 9 believe that NXIVM can claim trade secret status for 10 any NXIVM materials that it has made available to 11 the public through its own actions? 12 A. Maybe the materials. There is a difference 13 between NXIVM's trade secrets which generate the 14 materials and the materials themselves. If the 15 materials embody specifics of a trade secret, then 16 that is true. It is now sort of the cat is out of 17 the bag. 18 MR. SKOLNIK: Can I hear that answer 19 back? 20 (The following was read back by the 21 reporter: 22 "ANSWER: Maybe the materials. There is 23 a difference between NXIVM's trade secrets which 24 generate the materials and the materials themselves. 25 If the materials embody specifics of a trade secret,</p>

<p style="text-align: right;">Page 417</p> <p>1 then that is true. It is now sort of the cat is out 2 of the bag.") 3 BY MR. SKOLNIK: 4 Q. What research did you do to come up with the 5 12 Point Mission Statement? 6 A. I imagine in one sense it's my life. That's 7 an expression of what my experience was. I don't 8 know exactly I guess what you mean by research. 9 Q. Well, did you conduct any research 10 specifically aimed at creating a 12 Point Mission 11 Statement? 12 A. No, not a 12 Point Mission Statement. 13 Q. Which points of the 12 points did you come up 14 with first? 15 A. Um, I'm not sure. 16 Q. Did you create any early drafts of the 12 17 Point Mission Statement? 18 A. I don't believe so. 19 Q. So you sat down to write it, and it was just 20 one draft? 21 A. Yes. 22 Q. Paragraph 38 says, "As part of the 23 curriculum, students recite this 12 point Mission 24 Statement before class and reflect upon its 25 contents. The whole curriculum is based on this</p>	<p style="text-align: right;">Page 419</p> <p>1 on the 12 point Mission Statement: Using the model 2 I had discovered, we codified the subject matter 3 into twenty 2 hour modules and refined the wording 4 and order of each question." 5 A. Uh-huh. 6 Q. Did I read that correctly? 7 A. Yes. 8 Q. Can you recall sitting here today what this 9 list of the first group of 20 modules was? 10 A. Not completely. I can probably run off some 11 of them. 12 Q. Tell me what you remember. 13 A. Um, well, there's Rules and Rituals. There's 14 I believe it's Communication/At Cause, Honesty and 15 Disclosure, there's Work and Value, there's 16 Self-Esteem, there's Good and Bad, there is Excited 17 State, there is Persistency and Motivational State, 18 there is Intensity and Power State, there's Time and 19 Lists. I don't know if I mentioned Parasite Module 20 I and Parasite II and Parasite Practice, which is 21 Parasite III. There's a Tribute module. There is a 22 Money module. There's a Crime and Punishment 23 module. 24 Those are -- I mean, those are the ones that 25 come up off the top of my head. I think I listed</p>
<p style="text-align: right;">Page 418</p> <p>1 12 point Mission Statement and as students learn and 2 experience more, it is our hope they will gain a 3 deeper and deeper understanding of these tenets." 4 Did I read that correctly? 5 A. I believe so. 6 Q. What does it mean that the whole curriculum 7 is based on the 12 point Mission Statement? 8 A. It means that if you understand the 12 point 9 Mission Statement deep enough, that at this point in 10 time, one would gain a better understanding on the 11 whole -- of the whole curriculum, that they reflect 12 each other; and the 12 point Mission Statement is 13 something that helps in gaining a deeper 14 understanding of the curriculum. 15 Q. Is -- is the 12 point Mission Statement the 16 most important of NXIVM's trade secrets? 17 A. I -- no. 18 Q. What -- 19 A. Not at all. 20 Q. What trade secrets do you consider more 21 important than the 12 point Mission Statement? 22 A. The Rational Inquiry Method and all trade 23 secrets relating directly to that. 24 Q. Paragraph 39 you say, "For the next several 25 months, we continued to refine the curriculum based</p>	<p style="text-align: right;">Page 420</p> <p>1 like 16 of them. 2 Q. You say in Paragraph 39, "We continued to 3 refine the curriculum." 4 Who is the "we"? 5 A. Nancy, myself. 6 Q. Anyone else? 7 A. Not that I can think of. I -- it's my belief 8 that I learn from the people around me, from 9 students taking classes and things like that, so 10 although they are not involved in the refinement of 11 the curriculum, what I learn from them and the data 12 that I gather helps me. So Nancy and I are the 13 people that refine the curriculum, but the students 14 provide data to some degree. 15 Q. And when you say in Paragraph 39, "using the 16 model I had discovered," is the model you discovered 17 the Rational Inquiry Method? 18 A. I think it is a basis for the Rational 19 Inquiry Method. It is one of the foundational 20 things. That model has been developed and has grown 21 over the years. 22 Q. Were all 20 of the original modules based on 23 the Rational Inquiry Method? 24 A. The original 20 modules were either products 25 of or based on the Rational Inquiry Method.</p>

<p style="text-align: right;">Page 421</p> <p>1 MR. SKOLNIK: Okay. I'm going into a 2 whole new line of questioning now, and if we are not 3 going to -- well, we're not going to finish today 4 so I think we should stop for the day; and as I 5 suggested earlier, I think that we should while 6 we're all here agree upon a date to resume this 7 deposition if Judge Falk so orders it. 8 MR. CAMPION: We are disposed to 9 continuing until 7:00 this evening after a short 10 recess now and resuming tomorrow morning at 9:30. 11 That would take care of the question of checking 12 everybody's calendar and continue until 1:00 13 tomorrow if that is necessary. 14 MR. SKOLNIK: I cannot be here tomorrow. 15 MR. KOFMAN: I'm unavailable. This was 16 only noticed for a single -- for these two days. 17 MR. CAMPION: Well, the offer is there. 18 I have to accommodate my schedule to do this. I 19 believe McGuire -- 20 MR. McGUIRE: So do I. 21 MR. CAMPION: -- has to do the same 22 thing. We are prepared to do so. 23 So I do want to be sure that we've made 24 a record of the same, and I throw one other factor 25 out which I think is a practical factor.</p>	<p style="text-align: right;">Page 423</p> <p>1 MR. CAMPION: Okay. Then I gather this 2 will end up as the subject of some motion then. We 3 have accommodated your request that we have our 4 calendars available, and we've told you we're 5 available tomorrow. 6 MR. SKOLNIK: Okay. Let me -- let me 7 consult with my co-counsel. 8 MR. CAMPION: In any event, let's all 9 take five minutes, anyway. 10 (At this point, there was a short 11 recess.) 12 THE VIDEOGRAPHER: We're back on the 13 record at 5:44. 14 MR. SKOLNIK: We're going to adjourn the 15 deposition for the day. While I appreciate your 16 offer, it's been a long day today. Yesterday was 17 broken by the couple of hours that we spent in 18 settlement discussions, and there is no way that I 19 can finish my questioning today. And, 20 unfortunately, neither I nor Mr. Kofman nor 21 Mr. Landy are available to resume the deposition 22 tomorrow morning so we expect to make an application 23 to the Court to continue the deposition. 24 I repeat my suggestion that we should 25 try to before we all leave today find a date when</p>
<p style="text-align: right;">Page 422</p> <p>1 We've been living with this now for two 2 days. We're familiar with the Exhibits. As you get 3 away from a deposition, any deposition, we all know 4 that you have to get back up to speed. You have to 5 start to review a transcript from the start, getting 6 into all the Exhibits again. So I do want the 7 record to be clear that that is the offer that we 8 have on the table. 9 We're prepared to go until 7:00 tonight 10 after a very short recess here, resume at 9:30 11 tomorrow and continue until 1:00. 12 MR. SKOLNIK: Unfortunately, that's not 13 possible for me; and I heard at least one other 14 counsel say that they couldn't either. 15 I mean, I take your point about the 16 Exhibits being fresh in everyone's mind, and I 17 certainly would be happy to resume this deposition 18 next week. 19 MR. CAMPION: Well, we've brought the 20 witness down here. He had to rearrange his own 21 life. 22 We have our offer on the table, 23 Mr. Skolnik. 24 MR. SKOLNIK: Well, unfortunately, it's 25 one that doesn't work so...</p>	<p style="text-align: right;">Page 424</p> <p>1 everyone can make it if the Court so orders, but we 2 are going to stop for the day. 3 MR. CAMPION: Okay. Well, we have made 4 our position clear already, so thank you very much. 5 Okay. 6 MR. McGUIRE: Peter, before we go off 7 the record, you were going to give me dates for some 8 depositions. 9 MR. SKOLNIK: I do not have dates yet 10 for Mr. O'Hara, and I've already responded about 11 Paul Martin. 12 MR. McGUIRE: How about Mr. Ross? Is he 13 available on the dates we discussed? Did you send 14 me an e-mail saying something happened? 15 Maybe that was you. 16 MR. KOFMAN: I think that was me, and 17 I'll give you a call about that. 18 MR. McGUIRE: That's right. That's fair 19 enough. I just want to make sure we have some 20 dates. 21 THE VIDEOGRAPHER: We're going off the 22 record at 5:46. 23 (Witness excused.) 24 (The deposition was adjourned for the 25 day at 5:46 p.m.)</p>

Page 425

J U R A T

I, KEITH A. RANIERE, do hereby
certify that I have read the foregoing transcript of
my testimony taken on March 12, 2009, and have
signed it subject to the following changes:
PAGE LINE CORRECTION

DATE: _____

Sworn and subscribed to before me on this day
of

NOTARY PUBLIC
_____.

Page 426

C E R T I F I C A T E

I, CHERYL McGANN, a Certified Court
Reporter and Certified Realtime Reporter of the
State of New Jersey, authorized to administer
oaths pursuant to R.S.41:2-2, do hereby certify
that prior to the commencement of the examination,
the witness was sworn by me to testify to the truth,
the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing
is a true and accurate transcript of the testimony
that was taken stenographically by and before me at
the time, place, and on the date hereinbefore set
forth.

I DO FURTHER CERTIFY that I am neither
a relative nor employee nor attorney nor counsel
of any the parties to this action and that I am
not interested in the action.

CHERYL McGANN
C.C.R. License No. XI000918

A				
aaron 168:15 264:3,8 364:1,8	201:2 accuracy 330:20 accurate 209:21 330:9 334:9 412:12 426:12 acknowledge 414:20 416:8 acknowledgement 416:3 acquired 265:8 act 251:1 304:22 387:11 acted 199:1,12 acting 363:6 action 169:17,20,23 237:21,22,23 329:24 426:18,19 actions 217:14 253:7 314:7 318:18 319:1 416:11 active 224:17 actively 250:15 activities 186:7 297:14 300:15 activity 304:5,6 389:4 actual 269:17 286:15 364:17 397:19 ad 208:9 add 194:18 355:10 added 406:13 addition 274:2 381:18 additional 356:21 391:17	additionally 386:24 address 292:5 341:7,17 addressed 213:11 218:5 398:15 adelman 167:16 285:10 adjourn 344:10 423:14 adjourned 344:11 424:24 administer 426:6 adult 385:18 387:13 advance 227:5 advanced 228:3 380:18,20 advancement 197:6 advantage 184:1,4 adverse 208:1 advertise 226:2 advertisement 294:23 advertises 310:3 advertising 288:18 advice 254:19,22 308:17 advise 311:13 advised 344:4 advisor 372:5 affidavit 168:7 202:22 208:22 209:11,15 209:17,24 211:19 215:3 221:9 222:1 226:18 229:22 230:14 233:19	236:23 239:4,7 373:20 374:2,6 380:11 382:18 affiliated 336:1 affirm 330:19 afternoon 285:8,13 afterward 300:6 age 374:17 376:8,10 376:23 agenda 356:1 agent 225:11,16,17 aggressive 287:23 347:9,11 ago 210:1 220:9 275:23 280:22 288:10,12 292:4 306:18 369:9 371:22 agree 196:24 243:8 249:7 254:2 287:21,22 310:25 344:11,14 348:2 348:15 415:6 421:6 agreed 330:5 353:9,15 agreeing 371:15 agreement 202:11 274:18,19 280:3 353:12 354:13 371:12 372:19 373:5,13 389:11 411:23 412:4 agreements 248:25 aha 193:20 ahead 253:23 296:6	298:12 353:1 378:8 aimed 417:10 alan 168:3 342:19,20 363:7 albany 261:16 262:22 384:21 alias 287:19 295:18 348:11 aliases 348:6 alive 351:8 alleged 299:17 306:12 327:7 allegedly 336:11 358:5,6 alliance 233:6 allow 178:8 183:25 354:20 382:22 386:13 389:2 allowed 261:3,18 273:15 406:14 allowing 386:21 allows 197:6 268:18 277:14 alphonse 355:24 357:13,14 357:15 alumni 226:24 amended 168:9,16 239:18 239:25 324:6,9 amendment 249:16 america 233:7 amount 242:1,24 246:21

344:25 345:7 375:18 383:15 amounts 207:22 375:20 377:4 analogous 191:13 analysis 170:4 173:3 399:21 409:20 410:17 analyst 230:10 analyzing 374:21 anamann 336:11 animal 261:18 animals 261:2,5,6,20 anna 165:14 166:3 announcements 218:18,19 answer 171:24 206:1,17 222:15 233:4 272:24 285:16,21 286:5,7 301:5,8 301:15 302:11 305:15,15 319:6,9 320:17 321:25 339:1 343:4 350:6 350:8 351:21,21 353:1,17 354:25 355:5 356:8,18,19 357:9 404:8,12,12 404:21 410:5,15 414:12 416:18,22 answered 207:4 335:4 367:3 373:7 answering 356:23 403:13 answers 349:17 anthony 269:16 antimysticism	197:15 anybody 216:17 271:22 272:3,5 308:14 381:23 anyway 403:15 423:9 apart 341:23 apartment 341:13,13 apartments 341:20,23 342:2 apologize 174:3 appalled 295:3 296:2 apparently 242:15 316:12 appeals 203:11 appear 182:22 216:5 appeared 243:22 356:24 414:19,23 appears 192:17 201:25 202:1 209:11 234:5 245:25 266:7 293:15 appendix 235:25 412:7 application 168:14 194:4 263:13 264:2,8,16 344:7,13 423:22 applied 192:6 374:23 apply 345:14 378:25 403:19 applying 345:6,14 384:9 appreciate 423:15 appreciation 204:8 approach 309:1 350:25	approached 351:3 appropriate 183:8 225:19 306:8 311:19 appropriately 170:13 approximately 331:11 aptitude 234:2 374:15 area 208:16 218:17,20 262:2 351:14 367:8,9,11 areas 271:14 arenas 350:14 arlen 237:15 283:8,13 arms 257:17 arrange 315:23 arranging 360:14 401:9 402:22 403:6 arrested 343:1 361:16,18 361:21 arrow 198:5 art 386:3 arti 187:20 article 170:3 172:13,25 173:11,14,20,21 174:9,14,18 181:16 185:6 187:12,20,25 191:10 193:7 194:11 199:6,9,24 200:8,15 202:1,19 205:17,19,25 206:9,13 208:3 276:6,10,10 277:15 283:23	293:13,15,16,19 293:21,24 294:3 295:10 306:20,23 306:25 334:6 339:21,22 397:6 399:23 401:21,23 401:24,25 402:5 405:3,5,8,11 articles 170:12 171:20 172:15,18 173:21 174:17,25,25 175:3 181:25 182:2,5 185:20 188:7 198:17,21 198:25 199:1,5,10 199:13 203:14 211:7,15 212:19 212:20 275:13,18 275:21,24 276:3 276:12,14 277:3 277:20,23 279:18 280:6,10,19 346:5 364:22 397:3,18 397:22,23 398:9 398:21 399:2,6 403:18,19 404:6 404:17,24 artistic 266:18 ascertain 183:8 ascertaining 405:18 aside 192:4 306:20 328:25 333:4 345:5 asimov 374:18 375:5,8 asimovs 375:11,13,16 asked 170:3 188:9,13 197:21 205:10 254:6 256:2 257:4 257:8 269:21 282:24 283:2,5,7 303:3,25 308:1 356:17 357:4	359:17 364:20 371:24 372:20 asking 173:8 189:19 199:15 285:12 333:16,17 357:2 asks 362:22 aspect 354:11 aspects 176:13 186:6 267:23 282:22 372:8 376:15,17 384:9 411:4 aspirations 257:20 assay 281:22 assembling 396:12 assess 188:10,10 assessment 243:8 assets 265:8 assignment 346:8,10 349:24 352:9 assignments 351:9 352:2 assist 174:20 273:12 274:5 assisted 287:5 associate 329:2 association 240:21,24 241:2 257:25 assume 179:11 187:4 202:6 209:12 286:8 288:5 312:13 assumed 188:11 315:25 assumes
---	--	---	--	---

341:21 assuming 184:11 344:12 349:10 assumptions 197:17,18 assured 344:6 astro 296:18 303:13 310:6 astute 198:24 athletic 378:14 attach 233:19 attached 168:21 208:23 233:18 attaching 354:10 attack 219:24 attacked 220:3 attacking 219:25 attacks 238:11 attempted 327:9 attend 211:1 253:11 attended 253:14 327:8 337:1 attention 210:4,20 240:6 261:6 296:22 313:22 326:12 327:16 361:11 387:3 attorney 256:25 257:5,6,15 257:18,24 258:2,5 283:13 290:25 291:4 297:11 300:7 314:12,20 336:19 351:19	352:19 353:4,22 426:17 attorneyclient 336:20 351:17 353:10 354:6,10 354:21 attorneys 166:23 167:6,10 167:15,19 250:20 255:5 256:14,20 257:9,25 258:1,12 268:17 271:15,23 271:25 278:8 295:11 340:12 366:23,25 367:2 auction 246:16 audible 340:8 audio 168:18 273:6 329:22,23 330:13 audit 243:9 august 168:8 169:24 208:23 216:17 238:21 239:1,10 374:7,9 author 193:3 298:7 authority 181:11 197:6 authorize 297:13 300:15 authorized 426:6 authors 198:1,3,8 automatically 219:21 available 211:5 336:13 416:10 423:4,5,21 424:13 avenue 165:23 167:8,13 aviv 165:14 166:3 167:19 168:18	285:11 289:6,9 290:18 291:9,22 295:4 296:2,10,10 297:7 299:1,5,6 299:10 303:3 304:7,13 307:17 309:16 312:8 314:23 315:2 317:18 318:10,18 319:24 330:14 331:12,15,25 332:5,7 340:24 357:20 358:18 359:1,12,15 360:22 361:7,10 361:10 avivs 315:6 358:16 avoid 290:11 aware 177:22 203:14 206:7,12 244:2,22 262:8 294:3 307:8 307:11,12,13 308:25 309:3,6 317:17,21,25 318:1 319:14 328:9,14 338:18 340:19,19 352:20 359:12 360:1 368:13 awful 310:5 axiomatic 409:4 axioms 393:9,12,16	251:7 252:21 263:1,11 270:11 271:3 291:10,11 294:12,13,15 295:10 301:9 302:6 303:9 305:11,21,22 320:17,18 322:1 323:17,18 341:20 351:24,25 376:11 376:12 386:12 402:1 404:15,19 408:10 410:2,7,11 416:19,20 422:4 423:12 background 380:8 408:14,19 backtrack 357:7 bad 180:23 207:20 241:5 400:24 419:16 bag 416:17 417:2 bailiwick 341:11 banal 196:24 197:3 bankruptcy 244:16 barbara 225:11 barely 297:6 299:1 barry 166:21 based 258:10 375:4,11 393:9 395:17,19 397:21 411:13 413:25 414:4,7 417:25 418:7,25 420:22,25 basis 189:20 228:6 346:7 348:23 349:2,4 352:21 354:12 364:7 378:5,11 384:8,10	394:12,15 411:21 420:18 bates 168:11 203:22 228:24 229:7,14 245:16 252:3 294:16,19 312:24 312:24 321:17 329:24 bear 294:7 332:20 343:8 380:8 bearing 321:17 bears 294:16,18 312:23 312:23,24 329:24 beauty 294:21 beg 198:6 353:1 began 249:3 367:25 376:22 beginning 169:12 186:16,16 209:1 299:14 307:9,11 329:18 355:4 371:6 beginnings 183:7 407:8 begins 326:14 begun 368:18 behalf 287:14 297:7 299:8 301:24 302:9 309:1 339:15 340:21 341:5 behave 376:18 behavior 378:6 379:1 belief 185:11 258:1 346:14 406:17 420:7 believe
---	--	--	---	--

171:10 173:21	399:10 402:1,13	273:14,19	204:4,16 264:17	brown
176:15 177:9	407:3 408:19,23	binoculars	386:17,18	234:17,18,20,21
180:21 181:10	408:23 409:9,12	298:11	bouchey	234:22
183:6 190:1,5,10	412:14 413:6,7,10	biography	225:11	build
190:11,11,12	413:12 416:9	277:9	bow	406:16
195:19,23,24,25	417:18 418:5	biology	189:17 268:5	built
201:21 202:23	419:14 421:19	335:16 379:9	boy	216:24 411:12
205:4 207:24,25	believed	birdwhistle	184:17	bumps
207:25 211:6,10	290:9 296:10	395:13	brain	383:22
212:7 214:14	319:21 347:15,16	birthday	282:11	bunch
217:9 219:2	347:20 349:10,11	380:15	branding	183:25 284:2
220:12 223:3,7,17	349:12 408:18	bit	339:18	293:24 307:20
225:1,11 231:2	believes	214:25 216:12	break	336:12 372:1
236:14 237:22	259:13 277:12	232:7 247:21	208:15 270:7	bush
240:19 241:24	305:9 372:21,22	263:12 291:12	345:2	231:16,23
244:14 246:25	believing	292:25 346:19	breakdowns	business
250:17 252:10,19	202:4 364:8	black	262:9,13	178:15 185:1,2,17
253:5 255:14	bell	234:18,22,23	breaker	185:25 189:9,10
260:4,22 261:15	252:16	235:12	180:14	208:11,12 241:5
265:17 271:17	benefit	blackberries	breaking	384:23 385:2,8
272:17 274:17	178:19 198:12	215:9	197:18 361:19	387:20 392:17
277:2 278:16	354:1	blatantly	362:7	businesses
287:9,25 288:22	bergeron	259:4	breaks	390:19
289:21 290:19,20	335:13,14 362:14	blind	305:10	buy
290:21,25 291:8	best	261:8	brief	246:17,19 391:20
292:9 293:23	330:8 345:3	blindly	207:7	buying
295:20,22 299:3	347:24 352:12	383:23	briefly	390:23
299:13 300:7	better	blog	203:3 292:23	buyline
301:20 305:8	217:3 218:13	187:12 188:16	bring	231:8,10 242:13
306:2 309:7	221:3 247:3 248:8	blogs	198:9 253:2	243:22 257:10
311:20 313:10	250:2 291:20	201:3	bringing	258:11 329:4
314:17,19,21	321:9 322:9	blue	184:9,12 390:21	390:13,14 391:4
315:9,21 316:1,4	356:14 357:3	234:16	brings	391:14,18,23
316:19 323:12	386:23,24 387:18	blurry	176:11 195:15	392:14 407:21
324:15 325:20,22	387:19 406:20	292:25	196:19	byline
327:14 328:24	418:10	bob	broad	276:15,16,24
330:21 332:10	beyond	271:21 310:18	185:10 315:3	bylines
333:3 336:14	197:17 377:25	331:5 333:5	370:18	276:17
343:12 345:23	394:16	366:20	broaden	
346:12 347:17	bibliography	book	323:2	C
349:2,11 351:7,18	402:5	228:15 277:9,13	broadway	cafritz
359:18 360:9	biddle	278:17,19 280:1,6	167:17	231:17 232:3
364:25 365:14	166:15 167:2	280:7,20 281:9	brochures	cake
366:24 367:21	big	375:16 377:4,6,6	243:3	179:12,12
370:18 371:18,18	255:3 290:17	388:2 391:6	broke	calculus
373:7 375:3 383:9	bilingual	books	170:2	386:6,6
385:7 388:9	276:23	279:7,22	broken	calendar
389:12 395:9,13	billionaire	boolean	423:17	421:12
396:20 397:5	226:8	393:21	brought	calendars
398:2,5,12,14,18	bin	bottom	262:22 422:19	423:4

call 197:15 201:6 202:12 225:21 233:11 268:4 281:23 299:15 305:5 352:11 358:10 366:2 389:18 406:8 424:17	259:21 cannon 297:16 300:20 capability 383:4 capable 189:21 262:18 capacity 207:18 208:1 230:8 capitalism 256:23 caption 165:16 capture 183:18 322:15 captured 198:21 320:15,24 car 213:16 carbon 178:25 179:1,2,3 179:5 196:4,6,6 card 208:11,12 244:14 244:25 245:1 care 421:11 career 257:17 careful 218:21 carefully 170:16 171:17 careless 201:6 carries 258:17 carrying 191:9 cars 214:20 carve 176:12 case 171:7,11 173:17 181:15 194:4 202:3,12 203:5,8 203:12 213:3 220:20 236:15	261:12 270:1,2 271:15,23 283:10 308:8 313:14 318:12 344:6 381:13 390:22 cassette 391:11 cassettes 391:11 casually 172:2 cat 416:16 417:1 catalog 391:9 catch 299:20 catching 304:22 cause 178:15 188:1 212:6 221:20 226:4 259:22 318:12 336:18 359:5 385:22 389:16 395:18 419:14 caused 259:21 cavanaugh 344:15 cd 330:2 336:12 center 165:23 166:22 261:14 centers 279:23 ceo 242:13 390:15 392:4,5 certain 181:6 187:10 191:19 198:7 207:18 232:22 243:23 246:21 249:18,18 259:8 265:17 266:18 267:23 273:4,9 286:2 287:15	311:13 376:19 383:16 388:23,25 389:1 395:18 396:1,5,14 403:9 403:21 405:1,7 certainly 171:2,3 193:23 198:2 205:5,7 209:16 210:17 216:14 236:16,20 259:9,21 269:5 290:14 297:13 300:14 304:4 310:15 313:18 375:7 377:1 413:24 416:7 422:17 certified 166:13,13 426:4,5 certify 425:3 426:7,11,16 cetera 255:6 challenge 349:15,18 chancellor 235:14 change 220:3 250:23 251:4 276:23 294:9 370:25 410:1 changed 254:25 255:1 369:5 385:3,9 changes 209:23 247:20 257:22,22 385:24 425:5 changing 248:19 characteristics 181:6 charges 241:4 244:15 charity 256:7 chat 329:12 cheat	256:9,12 check 270:9 checked 209:11 checkerboard 234:21 checking 172:25 421:11 chemical 178:25 chemistry 196:2 cheryl 166:12 426:4,22 chess 384:2 chet 334:7 child 291:11 332:20 children 358:17 chisel 389:21,22 390:1 choosing 394:1 chris 307:6 christ 296:11 332:20 355:21,23 358:17 chronic 217:21 church 218:17,23 219:3 335:6,9,25 336:1 336:7 circuits 391:7 circulated 232:8,15,24 409:3 409:14 circulating 409:16 circumstance 311:13 circumstances 207:16,21,23 269:4 309:5
---	--	--	---	---

343:13,14 373:15 cite 194:15 city 253:15 274:16,23 civilization 204:9 claim 194:10 197:5 228:18 233:1 315:15 406:3 416:9 claimed 219:25 316:10 322:23 325:10,23 claiming 192:23 359:15 claims 203:5 228:17 251:19 258:21 clarify 191:21 302:3 363:22 clark 370:7 class 187:13 188:17 227:20 249:12 253:9,9 262:15 386:1,18,19 405:15,17 417:24 classes 189:17 191:6 226:14 227:8,21 227:23 232:1,5 247:25 249:13 255:7 384:18,20 420:9 classify 339:8 clause 190:1 267:12 412:7 clear 184:2 204:8 254:11 338:8 353:25 422:7 424:4 clearer 263:21 400:24	clearly 303:14 client 181:8 299:4 309:2 clients 181:10 291:13 clifton 169:7 close 307:24 314:13 closely 337:10 340:10,11 340:12 399:4 closer 394:14 clubs 391:1 coach 222:23 223:3 224:17 261:11 coaching 401:9 402:23 403:6 coalition 390:21,22 cocounsel 423:7 codification 376:20 codified 378:12 419:2 coerce 325:14 coincidence 201:9,11,15 collaboration 276:7 colleagues 285:2 collected 333:20 337:13 collectively 285:20 286:1 college 227:12 column 277:15 columns 277:17 290:2 com	272:16 combative 312:6 combination 177:8 179:21 combinations 379:19 combined 387:12 come 185:11 189:4 199:17 210:20 223:24 224:1,2,5 224:6 228:19 229:20 257:3 261:6 269:13 277:3 294:13 336:16 341:22 342:1 355:23 366:16 367:4 369:4 372:2 407:18,20 417:4 417:13 419:25 comes 196:15 268:19 390:6 401:3 comfortable 409:1 coming 189:7 225:13 226:2 commenced 358:19,21,23 359:3,5 commencement 426:8 commencing 166:17 comment 170:8,9 303:12 309:14 401:7 commenting 267:11 comments 251:25 363:19 commission 228:12 common 197:2 406:15 communicate	273:2,9 375:19,21 377:3 394:2 communicated 334:21 communication 202:5,6 328:10 335:2 355:11,13 374:19 375:1,18 375:25 376:15,16 393:20 395:18 406:13 419:14 communications 182:8,19 325:7 355:1 376:4 community 275:12 392:9 company 200:3 228:12 231:2 233:7,16 243:10 244:25 245:8 265:18 289:12 295:3 296:1 339:9,10 390:14,18 391:13 392:4,5,8 394:19 407:19 411:10,21 413:19 compare 291:19 349:24 compared 383:4 comparison 381:18 compe 185:7 compendium 279:18 compete 187:6 competitive 178:5,9 184:1,4 competitor 172:9 177:6 178:3 178:7,13,20 179:8 181:2,5 184:15,16 184:20,22 185:7 185:24 187:19 188:20,25 189:3,4 189:11,14 190:7 190:10,11,12,13	190:16 191:23 193:17 198:12 269:12,22,23 284:11 405:6 competitors 173:23 177:22 178:24 179:3 181:8 187:5 189:1 189:2,22 190:3,8 192:1 199:2 283:3 283:14,20,24 compl 405:8 complaint 361:23 complaints 337:25 complete 174:4,5 189:22 295:1 320:15,24 343:14 completely 319:10 340:6 419:10 completion 304:9 complex 274:14 complies 175:6 209:7 240:8 313:2 314:10 327:4,22 374:11 380:12 393:5 411:8 component 388:5,12 components 388:16 394:21 comprehensibility 183:1 comprehension 405:9 compromising 309:9 331:23 computer 219:14 221:15 230:10 368:1 374:23 377:16 379:10 380:22 381:16,17 382:21
---	--	---	---	---

382:22 383:4,20 383:23 384:3,3,4 384:6,16,16,23 393:11,12 405:22 406:2,3 415:22 computeraided 165:22 computers 367:23 368:4,9 374:16 393:10 con 248:23 conceded 353:22 concept 175:20,21 180:16 192:18 385:2,9 386:5 387:15,21 403:12 concepts 195:7,8,10,24 198:9 205:4,5 248:23 276:8 374:18 376:7 379:12,17,19,20 381:7,11,11 396:9 398:3,11,15,22 399:7 401:14,15 403:2,10 concern 311:24 concerned 265:23 concerning 192:9 203:15 261:4 319:12 334:14 335:1,18 335:24 336:7 340:2 342:7 351:15 353:10 concerns 253:24 concert 339:15 conclude 344:19 348:8 354:18 concluding 271:12 conclusion	236:23 378:5 conclusions 378:17 concocted 304:3 conditions 263:20 264:21 condo 241:2 condone 304:5 conduct 259:7 417:9 conducted 340:20 341:4 359:10 conducting 259:5 confidence 246:9 confidential 165:17 193:6 202:13 249:2,5 251:11 264:3 278:9 364:2 380:6 confidentiality 202:15 248:23 371:12 372:19 373:5,13 389:10 411:23 412:4 conflict 223:10 247:21 248:1 connecticut 242:18 connection 220:19 257:9 286:3 connections 346:16 conocimiento 275:16,22 277:1,4 277:24 280:11 conocimientos 277:5 consid 181:1 consider 171:13 220:19 224:16 226:22	243:15 278:1 280:11 353:4 389:13 403:2 412:16,19,24,25 418:20 consideration 345:2 considered 170:6 266:19 275:9 considering 301:21 consistent 406:18 consisting 330:15 constitute 204:12 constitutes 254:13,18 constrictions 281:19 construct 393:15 construction 260:2,2 393:10,13 constructive 188:8 consult 423:7 consultant 347:1,2 384:23 consultants 238:10 consulted 363:10,12 consulting 254:19 347:5 consumer 211:3 391:18,19 consumers 210:25 231:8,9 242:13 243:21 257:10 258:11 329:3 390:13,14 391:4,17,22 392:14 407:21 contact 223:20 297:6 299:1,7 337:7,8,9	392:2 407:18,20 contain 174:1 194:1 280:11,18 411:4 contained 171:4 174:14 179:18 212:18 265:6 containing 211:24 contains 179:12 240:10 248:17 412:21 contemplate 179:7 399:12 contemplating 307:18 content 210:10 253:17,18 276:23 contention 210:13 contents 417:25 context 178:6 183:8 316:9 347:19 390:7 402:12 contexts 257:2 392:3 continue 300:24 301:14 344:16 353:17 354:25 357:9 381:6 400:8 421:12 422:11 423:23 continued 165:16 166:1 167:1 168:2 169:10 263:3 271:10 380:21 381:2 418:25 420:2 continues 234:6 326:14 continuing 169:3 205:1 215:13 231:14 296:8 318:20	326:25 352:8 355:16 357:10 378:10 403:8 404:22 421:9 contract 300:10,11 302:19 contractor 229:15 230:15 231:4 288:25 289:1 290:24 384:17 contracts 300:12 control 197:9 246:4 247:9 controlled 246:23 247:3 controlling 197:10 conversation 223:14 226:11 254:6 289:11,18 306:17 323:3 335:11 342:7 359:6 conversations 211:12 215:18 223:8,18 306:18 308:10 335:18 353:18 355:6 372:12,14 convicted 343:6 convinced 408:12 copied 193:5 264:24 267:6,13 copies 204:25 212:19 215:18 272:9 277:20,23 280:24 281:2 copy 193:6 204:23 212:1 222:1 234:5 263:20 264:10 293:12 332:17 373:23 412:7 copying
--	---	--	---	---

232:24 400:1 409:15 copyright 237:21 copyrighted 210:8 211:25 411:20 copyrights 237:14 copywritten 238:13 corp 166:24 corporate 284:7,14,16 corporation 165:2 166:6 228:12 242:22 284:10,17 285:19 285:24 324:7,10 corporations 284:7,9,13,22 corral 354:19 correct 199:7 213:5 218:3 234:13 249:11 259:16 265:15 279:11 302:1,11 302:18 319:19 323:10 325:24 338:7 362:8 364:15,19 367:18 369:11 370:2 371:13 372:19 373:1,6,16 375:11 402:7,19 406:25 408:6,8,13 416:2 correction 425:6 correctly 316:13 375:2 381:1 383:8 385:4 388:8 394:9 407:2 409:8 412:5,13 418:4 419:6 corrupt 297:11,11 300:7,8 300:13 cost	391:17 costs 236:13 237:16 counsel 248:8 330:4,19 340:16 344:4 345:14 351:13 354:13 355:1 360:16 363:2,6,9 363:12,18,20 366:7 422:14 426:17 counseling 254:13 count 294:14 counter 339:22 counterclaimdef... 165:15 counterclaimplai... 165:11 counterclaims 328:17,18,19 county 274:23 couple 285:17 292:25 302:15 306:21 340:1 399:5 423:17 course 182:1 186:25 191:15 196:2 199:18 211:1,4,8 211:15 224:10 240:14 250:7 266:24 268:20 277:12 328:8 368:7,8 369:25 370:4,11,16 373:4 385:17,21 386:16 386:19 courses 172:12 224:4,6 228:4 284:16 380:17,17,20 386:22 387:13 394:23 coursework	210:12 394:25 395:1,3 court 165:1 166:13 203:5,8,11,12 278:10 324:3 332:21 344:7 361:24 423:23 424:1 426:4 courts 296:13 covered 267:17 346:17 cpu 382:9 craft 179:5 crate 391:15 crawl 394:6 crazy 332:21 create 180:5,9 287:11 303:8 339:18,19 380:9 381:21 393:1 403:20 405:1 417:16 created 179:19 382:21 383:24 384:18 creates 303:9 383:13 creating 396:11 411:10 413:16,19 417:10 creation 396:1,5 credible 217:23,24 309:25 310:4 312:9 credit 244:6,10,14,25 245:1 crime 257:1 343:6 354:8 419:22 criteria 192:6	critical 170:4 197:16 210:11 399:21 criticism 181:16 186:2,21 186:25 criticisms 187:10 criticizing 181:17 cross 168:2 crossclaim 166:8,23 crossclaimants 166:4 crossexamination 285:7 345:10 cruise 315:24 316:11,11 317:9,11 culmination 236:6 238:7 cult 186:7,15 216:22 218:11,20 331:16 curiosity 376:19 curious 324:18 current 256:24 currently 210:8 219:19 331:20 curricula 256:15 curriculum 180:20 196:14,15 204:19 256:2,4,17 384:18,20 386:4 387:9 417:23,25 418:6,11,14,25 420:3,11,13 cursed 214:20 curve 382:24 cut 264:18 295:5	344:5 cute 261:5 <hr/> D <hr/> daily 214:16 dalai 371:14,16 372:7 372:18 damage 173:24 181:19 225:22,23 226:5 296:16 damaged 183:19 damaging 192:3 damato 296:12,15 355:24 357:13,14,16 358:16 damning 320:3,9 danzig 167:7 dashes 319:9 data 266:12 282:12 321:10,12 322:9 322:11 340:14,14 357:24 374:22 382:20 383:15,16 420:11,14 date 165:19 169:1 220:6 236:23 239:3,7 252:22 264:19 280:23 344:11,13,14 421:6 423:25 425:21 426:14 dated 242:8 244:7 251:13 374:6 dates 399:25 424:7,9,13 424:20 dave
--	---	---	---	---

231:16,23	170:11 172:24	delete	422:3,3,17 423:15	develop
day	381:8,8 394:2	355:3	423:21,23 424:24	374:19 376:8
169:2 216:11,16	405:8,9 406:15	deleted	depositions	380:21 381:2,6
239:10 343:19	418:3,3,13	271:18 367:25	228:11 424:8	developed
344:8 374:7	default	368:6,7	deprogramming	376:9 388:5,11,14
389:21 421:4	243:11	delineate	406:9	394:16 407:10
423:15,16 424:2	defend	286:5	depth	420:20
424:25 425:22	243:11	delineates	405:2	developing
days	defendant	401:15	derivative	378:16
173:7 344:23	168:9,16 239:19	deliver	268:21	development
399:5 408:15,17	239:25 324:5,8	313:19	derive	370:16 384:11
421:16 422:2	defendants	delivered	178:17 179:9	391:23 392:13
daytoday	165:9 166:8,24	313:16 361:22	derived	413:14
337:1	208:24 239:21	391:8	200:2 236:22	device
de	245:17 251:14	delivering	296:20 396:24	256:9
395:5	264:4 285:23	361:25 362:4	406:21 414:12	devices
deal	324:11 330:16	385:17	415:1	256:12
303:11,18,20	345:12,13	demonstrable	describe	devote
347:18	define	221:7	394:20	247:21
dealing	174:24 184:22	demonstrated	described	diagrams
225:9,10	190:7,8 223:25	282:8,9	215:21 315:16	398:15
dealings	230:1 250:12	dentist	323:4,14,21	differ
287:6	262:12 379:24	191:14	405:21 406:1	385:15 394:24
deals	380:1 390:5	deny	describing	difference
391:10,15,16	403:11 414:7	330:19	269:14	183:20 206:16
debt	defined	department	description	252:5,7 306:3
243:13,16,20,20	395:6,7,7	230:9 242:8	168:6 303:19	387:15,17 416:12
244:4,17	defining	243:24	designate	416:23
debunk	184:19	depend	278:8	different
409:5	definite	269:7	desire	170:10 174:1
decide	310:8	dependent	211:1	176:18 184:11
227:14	definitely	389:2 398:4,4	destroy	190:15 194:16
decided	196:13 253:5	depending	189:4 192:1	203:1 207:21
261:11 337:23	337:8	178:6 184:6	destroyed	226:21 228:14,22
decision	definition	193:22 269:4	368:18	230:13 238:9
227:16 354:19	185:13 186:11	403:24 405:2	detail	244:18 247:25
375:1	195:21 204:8	414:6	248:2 308:8	248:20 254:18
decisions	413:1,4	depends	399:24	255:14 262:16
363:17 383:7	degree	172:8 188:22	detailed	263:23 269:25
406:21	207:22 226:5,22	190:7 234:1	173:3	272:12 273:22
deduce	226:23,25 227:9	250:12 269:8,11	details	277:10 284:18
206:4 397:14	227:15 259:8,20	284:17 379:24	243:20 320:12,21	321:5 322:5
deduced	276:24 297:24	404:2	327:7 371:17	343:19 362:20
206:6	299:3 311:5 342:5	deposition	detective	368:4,5 371:24
deemed	346:14 350:19	165:18 169:3,12	199:15	372:3 375:24
325:12	406:11 416:7	172:2 217:10	determination	377:18 378:4
deep	420:14	271:13 295:17	411:11	386:22 387:12
182:25 196:16	degrees	319:18 344:5,14	determine	388:1 392:3,12
418:9	226:21 227:3,6	344:16,19 353:8	209:20 236:8	394:17,18 396:18
deeper	228:16	354:14 421:7	397:9	398:15 401:11

403:17 405:4 407:21,22 409:20 410:17 differently 357:25 difficult 238:16 259:18 303:15 difficulty 263:17 dinner 292:2 315:4,7 direct 168:2 169:10 194:23 218:14 271:10 292:25 296:22 313:22 324:23 326:12 391:13 399:18 400:8 402:20 405:15,18 directed 272:21 283:22 284:1 directly 176:22 177:24 185:12 205:2 236:16 274:16 276:6 311:12 359:22 364:4,5 370:21 372:12 379:14 388:22 399:9 403:24 404:2,3,25 418:23 dirty 293:25 dis 316:5 disadvantage 178:5,10 413:9 disagree 259:4 disagreeable 412:2 disagreement 305:2 disclose 176:14 189:13 266:20 397:3,18 397:23 398:10	399:6,8,10,11 403:19 404:25 disclosed 172:6 173:4 174:24 191:18 194:11 206:8,13 223:12 398:1 discloses 183:21 398:21 disclosing 189:18 disclosure 177:25 178:3,19 179:13 196:22 399:17,18 419:15 discontinued 229:9 discontinuing 309:18 discount 390:23 391:16 discourage 259:15 discover 177:7 376:5 389:21 discovered 374:15 379:18 393:17 419:2 420:16,16 discoveries 376:5 discovery 213:23 251:18 329:24 369:19 378:3,19,22,23 379:6 380:1,6,9 389:17,23 390:3,4 discredit 169:18,21,25 339:24 discuss 278:12 280:7,14 289:24 293:1 306:23,25 307:4 308:4,8,13 309:18 310:10 315:5,6 318:17 360:13 362:14 371:23 372:8 407:12	discussed 186:15,16,17 256:3 306:2 308:9 311:7 315:1 318:23 348:18 360:7 373:7 424:13 discussing 297:23 310:17,22 322:25 325:16 330:1 discussion 239:15 251:6 283:9 318:19 324:12 328:2 333:6 373:25 399:1 discussions 308:15,19,22 371:10,25 372:7 423:18 dishonesty 190:23 dismissed 203:5,8,9 disposed 421:8 disputes 392:11 disregarded 247:15 distribute 232:17 distributed 275:11 278:6 distributor 233:6 district 165:1,1 203:4 256:25 divine 197:5 division 230:11 dmc 165:4 doctor 191:15 doctors 262:21	doctrine 354:9 document 201:21 205:23 206:20 209:5,8,10 221:4,21 238:22 240:4 245:11,20 245:22 251:16,18 251:22 252:1,8,11 252:15,16 254:9 254:23 258:16 261:25 263:14,23 264:7 272:10,14 272:15,19,21 292:21 303:9 306:7 312:21 313:1,9,10,15,16 313:20,21 324:4 324:14 documentation 245:6,6 337:18 documented 299:21 306:11,15 321:9 322:8 documents 202:18 210:21 221:1,2,5,18 235:1,3 237:4 271:16 272:6 273:2,13 308:7 313:14 335:21,23 336:3,5 338:22 365:1,7,7,10,25 366:10,12 367:5,6 367:7,13,20 368:17,19,22,25 369:10,13,22,23 369:24 doe 165:14 dog 241:4 261:8,9 doing 170:10 174:19 185:22 189:12 237:18 262:9,11 266:17 292:13 296:16 297:14 299:20 300:17 305:4 406:21	dolan 167:13 dollars 236:5,9 237:8 238:6,24 243:3 dominant 252:25 door 391:8 doors 354:19 dossier 333:14 dot 200:25 double 235:7 doubt 222:1 289:3 304:7 doubtful 265:22 doug 314:14 download 219:20,21 276:8 downloaded 415:10,14,16,18 downtown 246:16 draft 209:15 417:20 drafted 266:2 drafting 209:16 drafts 417:16 drawing 378:4,18 drew 197:5 drinker 166:15 167:2 drive 166:16 167:4 219:14 341:17 driven 382:22 383:5 driver 400:24
--	--	--	--	---

drives 220:4 368:5	effort 223:23 224:1	378:1 385:1	387:11	esp 200:6,9 248:22
driving 213:16	247:22 310:5	embody 416:15,25	entertaining 387:10	249:3 250:1 255:2
drove 214:19	409:22 410:19	emotion 207:17 374:24	entertainment 387:2	265:7,8 413:16
due 242:19 243:25	efforts 246:13,22,24	390:9	entire 174:23 210:12,21	414:13
260:8	247:1,13	emotional 207:12	293:14 331:1	especially 179:14 181:9
dues 241:7,9,13,14,22	eggs 179:13,15,16	emphatic 320:13,22	354:5 357:7	184:7 198:12
duly 169:8	egregious 221:6	employed 229:12	entirely 297:8 299:9	200:1 221:4 397:5
duplicatable 408:3	egypt 260:1	employee 288:21 317:18,24	entirety 205:14,16,24	esq 166:21 167:3,4,7
duplicate 407:1,6,25	eight 192:6 401:15	426:17	206:9,13 208:7	167:12,13,17
duplicated 264:24 267:6,13	either 176:22 180:23	employees 392:5,6,8	210:15,17	essay 171:3 232:21
408:5	181:9,10 183:15	enabled 406:15	entities 283:19	essential 265:7 394:7
<hr/> E <hr/>	183:17 184:12,13	encourage 268:22	entitled 245:20 324:4	412:25
earlier 304:15 308:9,9	185:12 200:11	endeavor 378:6,11	328:10	essentials 247:24 249:23
318:23 319:20	213:25 250:22	endeavors 378:14,14,15	entrance 190:15	establish 357:4
343:22 345:20	256:4,15 273:11	ended 312:12 352:20	entry 187:12 188:16	estate 287:6
362:12 421:5	274:18 290:15	409:15	281:24	et 255:6
early 186:3 417:16	311:3 315:24	engaged 250:21	envision 247:11	ethic 268:7,12 269:6
earn 189:2 247:9	326:4 351:9 352:2	engagement 225:3	episode 262:14 263:4	411:14 414:5,6
earning 188:22 189:12	359:21 364:21	english 182:15 380:3,4,6	episodes 262:19	ethical 243:15 244:3
ease 317:10	365:8 391:15	380:7	equation 171:23,23 178:22	246:24,25 259:22
easily 238:4	404:3 420:24	enhanced 395:21	178:24	267:10 268:16
education 259:20 385:18	422:14	enroll 250:1,6,18 251:1	equipped 383:5	278:24 279:6,6
387:13 411:21	electronics 391:7	enrolling 387:3	erect 332:6	392:11
effect 169:13 182:7,11	elements 210:18 378:5,11	enrollment 168:14 250:13,14	erratic 255:10	ethically 246:3 247:3
184:11 218:18,19	ellipses 297:12	250:15,24 263:12	erraticism 255:12	ethicist 249:22
282:1,2,6,7	elses 241:5	264:2,8,16	error 200:5,5 201:5,6,7	ethics 392:16
effective 191:22	em 254:12	entered 240:11,18,20	264:18	ethos 249:21
effectively 189:7	email 211:20 213:11	241:12 242:7	errors 199:21 201:23,24	evaluate 189:20
efficient 385:19	218:9 219:7,13,16	278:9 380:15	248:18	evaluated 262:22 263:3
	219:19,20 220:10	entertain	escapes 291:1	357:24 384:19
	220:11,17 271:18			evaluating 262:18
	272:7 367:22			evaluation
	368:1			
	embodied			

189:22 190:23 evening 421:9 event 354:24 423:8 events 197:7 346:17 357:18 358:2 378:4 eventually 181:21 everybodys 421:12 everyones 422:16 evidence 199:12,16 220:19 303:25 358:7 359:17 evil 218:11 exact 236:22 280:23 394:1 exactly 237:9,12 251:23 274:22 320:1 328:15 347:7 417:8 exaggerated 326:4 exaggeration 316:14,15 examination 169:10 207:4 271:10 426:8 examine 282:2 367:22 376:3 examines 282:10 examining 376:17 example 171:19 190:14 201:13 214:5 237:15 250:18,22 250:23 256:8 266:17 269:15 273:6 283:22	386:4 388:1,23,24 392:5 400:12 404:4 examples 186:8 400:8 exbusiness 329:2 exceptional 374:15 excerpt 168:18 329:22 330:6,7,13 331:1 excited 419:16 exclude 317:11 excuse 251:3 294:8 296:7 363:24 370:24 409:25 excused 270:15 424:23 execute 355:25 executive 165:3 170:4 192:7 231:20 265:7 285:20,24 399:21 exhibit 168:6 200:17 204:23 208:24 235:25 239:13,21 245:18 251:14 264:4 292:22 312:23 319:15 324:11 330:16 373:17 375:8 exhibits 168:8,21 208:23 233:19 422:2,6,16 exist 181:17,20 191:3,4 214:13 237:4 323:12 325:23 326:3,7 379:18 407:10 existed 307:3,5 323:15,22 352:17 existence	177:20 293:17 existing 260:1,2 exists 214:11 321:14 390:3 exit 273:21 expand 304:24 305:24 expect 423:22 expense 265:8 expenses 238:18,19 experience 207:17 257:8 267:24 372:6 391:22 392:20 408:14 411:19 417:7 418:2 experiences 258:10 268:23 experiential 388:3,5,12 experiment 376:14 experiments 376:22 377:1,9 explain 181:13 235:1,4 246:7 248:13 252:9 301:15 325:25 385:20 409:21 410:19 explained 285:14 explanation 207:7 explicit 268:20 exploration 254:11 262:10,11 explorations 253:24 explore 349:14 explored 387:25	exposed 370:20 express 318:9,14,25 319:11 expressed 255:24 256:1 283:17 290:4,6 expresses 248:21,22 expressing 394:11 expression 248:16,21 412:6 412:22 417:7 expressive 376:16 exsenator 296:12 extent 174:5 366:1 396:16 external 207:16 extras 264:13 extreme 372:6 extremely 255:10 258:5 extremes 207:9	317:17 318:10 322:22 333:19 334:4,25 351:2 357:15 360:1 414:17 factor 261:5 269:9 421:24,25 facts 211:24 factual 355:8 fair 248:3 350:13 375:12 397:17 424:18 fairly 196:24 293:1 fall 344:15 354:4 421:7 fall 292:19 341:11 405:15,17 fallacies 409:19 410:16 falling 343:11 fallon 223:1,6 224:22,23 fallons 223:2 falls 413:12 false 183:16,21,23 184:10,12 211:24 225:4 299:2,24 falsely 325:11 familiar 242:10 279:4 286:13 422:2 families 268:24 family 175:15,24 186:3 267:22,25 fantastic 303:9
F				
fabricate 303:8,25 358:7 359:17 fabrication 303:14 face 210:10,14 facilitator 194:12 233:23 facilities 235:22 273:23 fact 177:25 178:3,15 183:22 190:13 192:22 204:15 228:21 295:18				

far 172:24 221:6,6 243:7 256:17,18 283:25 300:23 301:13 303:15 357:15 368:15 394:2 406:14 414:9	284:5,6 figure 172:10 238:11 397:10 filed 213:25 237:21 239:3 242:19 328:18 files 331:13,15 365:8,9 filing 169:17,21,24 final 193:23 198:15 265:19,21 finally 265:13 393:14 finances 334:2,5 financial 334:9,13 financially 241:20 find 177:1,2 178:11 182:10 200:14 201:8,10 218:25 249:4 259:1 282:1 283:22 294:7 295:10 309:25 310:3 331:16 333:12 334:1,21 351:3,4,5,6 364:24 383:25 406:15 407:25 408:4 412:1 423:25 finding 175:22 399:16 findings 354:8 fine 187:10 241:6 244:6,10 262:24 312:6 343:4 356:9 fingerprints 199:14 finish 319:3,8 353:1 399:3 404:8 421:3	423:19 finished 191:14 305:14,15 405:16 finishes 356:19 fire 340:15 firm 285:9 290:25 291:1 308:11 339:13 350:3 352:19,22,23 360:12 firms 283:24 291:7,17 291:18 349:20 351:10 352:3,18 352:21 first 165:3 168:9,10,16 175:13 181:14 182:12,13 187:19 195:8 210:7 211:22 226:22 227:12 228:3,20 233:11 237:22 239:18,20,24 240:1 242:4 243:21 264:15 267:11 281:25 288:3,4 291:1,3,6 293:15 294:14 295:1 296:23 297:5 305:3,12 313:8,11,23 319:15,23,25 324:6,9 326:24 337:19 341:12 358:2 380:13,19 381:15 393:11 399:20,23 400:20 401:1 409:4 411:9 411:23 413:18,21 413:22 417:14 419:9 fit 182:16 303:13 383:16 fitness	294:21 fits 402:16 fitting 382:24 fitzsimmmons 165:23 five 190:2 206:24 328:4 371:1 423:9 fivepage 168:13 251:11 flintlock 169:7 florham 166:16 167:5 flow 411:13 414:4 flows 414:6,14 focus 399:18 follow 222:8 277:24 356:8 411:18 followers 201:1 following 165:16 296:22 298:17 301:9 302:6 305:22 320:18 322:1 323:18 351:25 354:2 404:15 410:11 416:20 425:5 follows 169:8 271:8 followup 270:10 343:21 fomented 363:20 footprint 397:10,11 forbes 283:23 339:21 forced 181:18 foregoing 327:19 425:3	426:11 forensic 205:19 forgot 204:16 form 206:10 248:6 264:15 268:8,20 269:19 275:5 297:20 337:3 350:4 360:18 414:13 415:17 formalized 380:22 393:18 406:4 formally 172:3 former 332:23 formerly 165:2 formula 170:22,23 178:24 178:25 179:2,3,5 196:2,3,6 412:23 formulas 179:1 forth 426:15 forum 214:6,6,7,8 256:16,18 forums 256:2,4 forward 277:13 278:11 281:9 foster 392:9 fought 243:9 found 255:12 297:10 300:6 303:10 316:11,13 347:8 348:8,10,13 355:8 369:22 406:12,25 407:5 foundation 374:17 375:17
---	---	--	--	---

377:7 385:10,13 394:12 foundational 414:10 420:19 founded 229:25 230:1 founder 226:8 founding 231:8,20,24 four 231:9 321:23 328:4 382:19 384:5 fourpage 251:17 fourstripe 223:3 fourth 206:21 294:15 fragment 191:20 frame 308:24 341:3 frames 357:5 framework 409:5 franchise 274:18 franco 165:7 169:23 194:13 208:4,6,8 371:11 francos 168:10 239:19,25 frank 286:25 287:2 289:25 290:4 293:23 294:1,1,2 295:18 300:21 301:2,6,11,19 343:10 345:21 franks 290:15 346:15 fraud 354:9 free 211:5 246:20 376:18	freedom 259:8 freely 211:2 french 379:11 frequently 214:24 fresh 422:16 friedman 167:16 168:19 285:10 330:14 friend 219:2 223:4 311:4 314:12,13 335:16 362:17 377:2 friendly 224:19 310:24 360:21,24 friends 175:15,24 186:3 231:9 299:3 312:8 346:20 361:1,2 407:22 front 203:2 220:2 241:19 277:8 324:19 332:2 fulfill 250:5 full 170:14 182:13 202:21 295:13 296:23 297:5 303:19 313:23 327:2,3 function 224:18 309:22 functional 380:23 381:14,25 382:1,11 functions 331:22 fund 233:7 fundamental 249:7,9 305:2 411:10 413:15,17 413:19,21,22,23	413:24 funded 229:17 311:25 funding 229:19 funds 243:23 funny 363:16 furry 261:20 further 197:18 210:24 213:9 238:11,12 343:24 404:19 412:3 426:11,16 furthered 392:15,20 future 315:1 <hr/> G <hr/> gain 418:2,10 gained 370:16 381:8 gaining 418:13 game 224:5 377:2 gammipi 382:8 383:14 garbage 304:11,14 gateway 166:22 gather 340:14 405:7,9,10 420:12 423:1 general 255:5 256:14,20 257:9,25 258:1,5 258:12 283:16 285:14 335:20 366:13 393:23 generalized 269:19 generally 248:14 325:9 346:4	generals 257:6,15,18,24 258:2 generate 345:21 346:2 416:13,24 generated 242:21 406:23,24 generously 188:12 gentleman 231:15 286:24 356:17 genuine 312:10 genuinely 250:21 geometric 383:21 gestures 285:16 getting 203:18 210:24 237:17 248:4 267:15 311:14,15 311:17,18,18 394:14 422:5 gibberish 183:14,23 185:17 185:19,22 187:15 188:2 girlfriend 252:24 253:2 332:3,23 girlfriends 331:24 gist 182:4 give 170:16,18,23 171:19 184:5,5 193:7,9 196:1,7,8 200:13 203:20 204:8 214:6 219:8 225:24 232:21 271:25 282:12 284:15 294:7 317:15 319:8 352:12 357:6 370:13 401:5	424:7,17 given 187:7,7 191:1 194:12 204:9 211:2 217:20 273:17 319:18 349:24 351:10 352:3 355:24 364:18 366:5 373:2,11 gives 184:3 196:5 204:18 giving 189:21 214:6 282:19 311:22 347:21 356:18 glasses 304:19 go 170:15,22 175:5 176:25 187:25 190:15 192:5 197:17,19 207:9 208:15 214:3,5,6 218:13 227:17 230:20 234:24 235:13 243:25 246:17 248:2 250:14,17 253:23 254:21 263:11 268:22 269:2 271:19 273:16 295:10 296:6,13 296:13,19 298:12 302:14,25 329:11 330:10,25 333:7 344:18 353:1 355:25 357:6 378:8 383:25 386:11,12,21,23 391:12 400:15,19 408:10 422:9 424:6 god 331:25 332:7 goes 214:7 241:4 256:17,18 297:5 331:13 368:16
---	---	--	--	--

401:10	graduate	414:12 417:8	happily	291:3 296:9 301:7
going	226:18 380:16,18	guessing	403:13	302:4 315:18,20
173:17 174:16	grant	277:19	happy	315:22 316:3,19
182:24 194:8	292:5	guiding	422:17	321:24 328:23
203:11 208:15,18	grants	411:11	harassing	358:10,17 364:3,5
209:4,14 213:9	344:15	guilt	357:15	387:5 416:18
217:4 218:15	graph	180:19 181:3	harassment	heard
228:11 232:6	383:16 384:1	guilty	332:22	218:18 224:25
233:20 243:10,19	great	180:13,18	hard	236:15 244:10
251:16 268:1	258:2,3,13 265:8	guinness	194:14,17 198:19	245:6,7 258:21
270:12 277:22	346:14 387:6	228:15	198:24 219:14	259:5,24 260:9,12
278:12 281:4	396:16	guy	220:4 252:14	260:17,19 261:17
285:3 286:8	greatly	189:17 268:3	257:21 282:12	286:11,24 289:3,5
292:21 294:4,11	261:5	303:7	326:8 368:5	289:12 291:4
298:10 303:10	green	guys	hardin	295:24 296:9
304:16 311:10	234:16	217:3	334:7	304:10,12 305:13
312:16,21 313:7,8	groceries		hardworking	307:18 309:12
316:17 317:7	391:8	H	408:24	310:6 315:21
319:6 324:22	grocery	half	harm	316:2,4,5,7,9,21
326:4 329:8,14,25	391:9	174:16 241:17,18	178:16	319:5 321:5,6
330:11,25 331:17	ground	241:18 301:4	harness	322:5,6 328:24
331:19 340:1	285:14,17	halfway	389:5	332:11 334:6
344:2 345:6 348:5	group	186:4 194:21,23	harnessed	337:15,19,21
351:14 353:7	171:2 182:16	200:24 331:12	246:25	338:1,9 339:9
355:19 357:8	183:11 184:7	hammer	harold	341:11 355:17,18
362:23,24,24	185:8,14 186:2,5	389:20,22,25	167:7 202:9 204:1	355:18,20 357:12
373:17 374:13	197:10 219:24	hand	hate	357:19,20,21
380:13 399:23	223:2 229:8	176:24 263:6	207:9	358:2,4,8,15,22
408:16 421:1,3,3	249:13 253:4,6	313:16,19,20	hawn	358:23 359:21,22
423:14 424:2,7,21	318:7 370:9,10	332:18 390:20	225:3,6,13,18	361:18,20,21
goldie	375:16 382:8	handful	226:1	422:13
225:3,13,16,17,18	383:15 419:9	289:23	hawns	hearing
226:1	groups	hanging	225:16,17	242:4 300:1
good	186:6	330:6	hazard	310:19 331:9
169:11 226:5	growing	handle	296:3	350:13 357:12
238:17 257:22	233:16	346:15	head	364:11
266:3 285:8 293:7	grown	handled	178:21 180:4	hearsay
299:20 320:4,9,15	420:20	180:20	212:17 230:11	321:7,12 322:7,12
320:24 339:20	growth	handles	233:5 277:5,7	326:4
342:5 347:16,17	233:12	374:22	339:20 392:3	heart
350:12 387:1	guarantee	happen	419:25	210:11
405:7 419:16	332:16 391:21	244:2	heading	held
gotten	guard	happened	175:14,23 211:20	166:14 219:23
235:11 263:19	249:4	244:17 269:22	headquarters	239:15 251:6
291:10,11 307:20	guarded	291:18 308:23	167:8	320:6 324:12
318:4	249:3	309:3,6 312:15	health	328:2 333:6
government	guess	424:14	294:21 407:19	373:25 399:1
256:22 296:18	212:20,21 213:6	happens	hear	heller
gradations	265:9 296:3	214:24 250:16	215:3,7 219:1	291:1,5 292:14
235:2,4	327:13 379:25	269:24	266:24 283:1	308:11,16 318:8

319:21 327:13 349:21 351:11 352:4,19 360:12 help 250:2 378:13 388:14,14,23 392:10 helped 367:17 helpful 309:22 helps 418:13 420:12 hemorrhaging 238:12 hereinbefore 426:14 hesitant 188:5 high 242:25 380:16 higher 234:14 257:20 highest 234:12 235:7 highlighted 192:8 highly 191:22 393:23 406:18 hill 292:5 hint 176:22 hints 178:16 hire 238:10 291:17 340:15 349:20 350:2 363:1 hired 287:4,9,13 288:19 292:7,8,12 297:7 299:8 339:17,23 345:21 346:2 360:11,12 363:13 hires 297:11 300:7 363:9 hiring	303:3,7 308:12,13 308:16,19 350:25 387:8 history 228:4 233:16 380:21 hochman 176:18 190:11,17 199:9,11,24 200:4 200:11,12 201:7 201:13,16,18 202:18 203:6,8,9 203:10 212:19 397:2 398:9 hold 182:10 226:4 227:5 247:13 265:1 319:3 402:4 holds 207:23 home 274:3,6 362:4 370:5,8 homebased 390:19 homeowners 240:21,24 241:21 honest 201:23,24 252:10 255:12 408:23 honestly 189:21 292:19 honesty 190:23 419:14 hope 217:4 418:2 hoped 255:11 hopper 265:18 horrible 348:15 hospital 262:22 hostile 214:21 252:25 hotel 263:1 hour 174:16 408:16	419:3 hours 173:7 303:7 344:3 345:4,5 382:9 408:17 423:17 house 216:24 241:17,19 288:4 292:2,5 302:22 307:14 314:25 359:2,20 361:19 362:7 367:8,13 369:3,10 369:13 howard 233:8 hows 331:21 human 184:25 196:17 247:23 249:23 374:19 376:3,14 376:16,18 378:6 378:11,14 379:1 382:20,22 383:3,4 383:12 384:1,4,5 384:9 390:9,10,11 393:17 406:2,7 humancreated 383:14 humankind 207:15 humankinds 204:10 humans 207:25 383:25 384:25 humoring 311:3 hun 237:7 hundred 221:5 243:2,4 hundreds 198:23 236:4,9,19 236:25 237:7 238:5,18,24 406:25 407:5,13 hung 189:9 hurt	184:13 hyland 167:7 hypothesis 201:15 hypothesize 244:11 <hr/> I <hr/> idea 184:15 192:14 195:18,19,24 196:25 241:14 274:23 350:25 375:23 376:1 ideas 181:2 197:3 248:22 375:4,11 375:13 394:11 409:17 410:13 identification 168:6 208:25 239:22 245:18 251:14 264:5 324:11 330:17 identified 171:9 244:6 295:12 297:22 334:8 374:1 identify 170:5 172:6 173:4 173:12,18 174:10 174:13 282:25 283:3 identifying 174:21 identities 226:4 idiosyncratic 182:8 187:16 ignored 217:15 ii 165:18 419:20 iii 253:18,20 419:21 illegal 297:14 299:11 300:10,12,15 302:17	image 339:7,18 imagine 257:12 266:15 279:24 287:15,20 289:10 304:14 320:11,20 326:8 339:8 345:25 346:5 359:7 369:19 381:25 383:21 415:10 417:6 impact 232:25 implementation 327:10 implications 405:10 implies 340:22 405:14 414:25 importance 394:5 important 180:21 182:23 183:1,2 197:14 210:17 248:24 258:4,6 261:12 311:4 368:15 369:7 418:16,21 impress 331:18 impressed 291:12 impression 311:21 318:2 361:1,14 362:3,9 impressive 331:21 improbable 201:8 improperly 198:9,10 improve 339:7 ina 305:5 inappropriate 305:5 306:4 325:12
--	--	---	--	--

incident 211:10	indictment 217:14	343:2	222:14,17 229:11	interested 356:5 426:19
include 215:20 236:13 248:4 251:1 266:13 267:21 354:22 396:7 409:17 410:14	indirectly 176:15 379:15 399:11 403:22,23	initial 280:25 409:24 410:21	262:8,19	interesting 180:24 257:23 260:5 375:21
included 409:24 410:21	individual 179:25 180:1 217:21 406:18	input 381:15	institute 165:7 167:15 229:23 230:3 385:3,10 387:16 387:19	interests 347:25
includes 237:24 314:1	individuals 231:18,19,25 232:1 262:9	inquiry 172:12 275:3 277:4 280:7,15 281:14 282:6 370:17,23 372:9 373:3,8,11 374:20 375:4,9,10,15 376:2,6,7,11,21 377:21,23 378:1,2 378:16 379:13,17 379:21 380:4,5,5 380:22 381:3,5 384:12 385:11,15 385:16 388:17 389:8,14,18 390:8 391:24 392:14,22 392:23 393:2 394:13,17,18,19 394:22,24 395:2,4 395:12,17,20,20 395:22,25 397:8,9 397:13,14,16 403:20 406:6 407:8 411:5 418:22 420:17,19 420:23,25	instruct 268:17 271:15 351:20	interface 287:9
including 355:5	industry 232:8 233:14 409:3,6	insane 303:11,18,20,21	instructed 220:25 271:17	interfacing 211:23 224:20
inclusive 267:20	infer 397:20	inspirational 377:23,25	instruction 271:20	interfor 165:13 166:3 167:19 285:11 289:13,16 290:20 291:9 292:8 294:17,19,19 296:23 302:17,20 307:9 308:1,25 309:19 312:12 314:2,4,6 315:22 317:18 318:7 321:18 322:15 328:10 329:25 333:19 334:4,13 334:25 337:12 338:21 339:15 352:14,18 354:5 354:22 357:19 360:2,15
incompetencies 243:23	influence 375:14 391:23	inspire 207:16 247:19,20 248:1 375:13	instructors 384:20	interfors 307:16 308:4 315:1 318:20 319:12 325:10 327:9 337:1,7 338:19 339:5 351:16
incomprehensible 182:20	influenced 253:3,6,7	inspired 374:18 375:7,10 387:6	integrates 195:11	interlocked 396:14,17,19
incorporated 202:2 249:6 285:11 289:13	infor 267:4	instances 211:10,11 217:16	integration 204:18	international 231:1
incorrectly 234:11	informally 409:12		integrity 252:8	internet 187:21 210:9,15 210:22 211:5 238:15,21 239:1 307:21 336:13 340:23,24,25 341:15 349:3 362:19 416:1,5
increase 185:5,8,11 207:25 283:17 389:2	information 168:22 177:18 178:1 179:6 193:12,22 196:9 199:21 211:4,22 212:1,4,12,15,23 213:4,8 219:6 222:7 228:9 238:13,25 249:2,4 264:24 265:6,10 266:11,13,19,23 267:5,13 272:1 296:21 307:20 316:17 318:3 319:22 333:20 334:13 335:1,22 335:24 336:12,16 338:6,19 341:10 355:9 357:24 358:15,17 364:2,9 375:20 381:14 386:2,25 405:7,19		intellectual 388:4	interrelationships
increasing 185:3,15 188:18			intelligent 405:6	
incredible 355:19			intensity 419:18	
incumbent 386:1			intensive 175:9,19 176:6 177:14,14 179:18 179:19 187:11 249:21 371:18 401:2,20,22 402:17	
incurred 238:20			intensives 263:7 284:19,22	
independent 207:13,22 230:15 288:24 289:1 290:24 384:22			intent 249:3 269:7	
indicate 223:11 224:22 355:4			intention 325:14	
indicated 224:23 263:16 279:15			interacted 255:11	
indicates 202:19	informed 186:20 224:8 325:13		interaction 214:23	
indicating 197:12 252:3	infraction		interest 330:25 357:16 387:4	

292:16	300:8 308:12,13	itemized	join	247:15 248:13
interrogatories	308:16,18	237:3	248:9	254:20 255:12
168:10,17 239:20	investigators	items	joint	264:18 281:23
240:1 324:6,9	291:6 308:19	253:22 356:1	229:18	285:18 286:3
interrogatory	350:23 351:1	iteration	jones	290:8 293:4,14
324:24 326:13	investors	381:18	314:11,15,15	294:18 297:19
327:17,23	387:24	ivy	joseph	300:25 301:2,15
interrupt	involve	276:19,19,19,23	251:12,19 319:21	302:14 304:18
356:2,13,14	352:7		349:19	305:4,17 310:12
intervention	involved	J	journal	311:3,18 317:10
382:23	201:14 209:16	jane	275:9,13	317:11 319:7
interview	214:1 225:25	165:14	journals	320:16 325:6,16
360:14 371:21	231:19,24 237:16	janitor	275:7,8	326:22 333:5
406:24	241:3 261:10	219:3	journey	335:19 338:6
interviewed	278:25 279:2	jay	384:13	343:9 351:21
371:19,20 384:19	296:17 300:5	192:5	joy	353:7 356:2,12
407:5,14,17	316:24,25 317:4	jersey	185:3,5,8,12,15	357:8 367:24
interviewing	318:8 325:9	165:1,24 166:14	188:1,18 207:19	369:18 370:8
407:24	327:14 329:3,4	166:16,23 167:5,9	207:22 208:1	373:21 375:25
interviews	363:17,21 365:4	167:14 341:16	247:19 283:17	379:4,5,23 380:15
347:21	366:21 371:25	426:6	jr	384:2 387:8,17
intimately	387:18 393:19	jjo000699	286:25 287:2	400:21 402:10
300:5	396:1,4 398:8	312:25	343:11	405:20 412:11
invalid	420:10	job	judge	415:3,18 417:19
300:12	involvement	340:15 363:1,4,4	305:11 344:15,15	424:19
invariably	224:20 346:22,23	363:8	351:14 354:4,4	justice
366:16	352:14	joe	421:7	170:14
invasion	involves	217:15 252:1,10	judgment	juval
326:5	336:18 374:21,22	252:23 254:6	240:20 241:12	165:14 166:3
investigate	374:25	255:10,11 291:2,4	242:2,3,5,7 244:7	167:19 168:18
308:2 333:13	involving	291:13,14 292:13	244:23	285:11 289:6,9
360:2	170:22	299:14,19 306:19	judgments	290:18 291:9,22
investigated	ipac	309:7,7 310:13,14	240:11,17	292:12 299:5,6
307:12 311:9	228:9	310:16,21,24	july	300:10 303:22,23
investigating	isaac	311:1 313:19	353:23	304:1 307:14,19
349:8 359:8	374:18 375:5,7,11	314:13,13 318:7	jumps	309:8,20,21,25
investigation	375:13,16	327:13 337:10,20	298:21	310:8 311:22
291:7 299:9 307:9	isolate	337:25 340:10,11	jury	312:8 315:2
308:4 328:12	388:14	351:18 352:17	282:5	319:24 330:14
333:12 334:1,21	issue	353:4 360:10,11	just	340:24 355:18,20
337:14 339:5	170:11 254:16	365:4,20,21	172:2,25 174:15	357:13,20,22
354:6,11 358:18	306:11	366:20,21	187:15 188:14,24	358:2,4,5,15
358:21,23,24	issues	joes	189:10,23 191:25	359:6,15,19,22
359:2,5	199:2 201:14	363:4	192:22 193:7	360:22
investigations	368:2,19	john	194:8 195:25	juvals
297:8 307:16	item	165:14 190:11,17	196:9 197:1	360:12
315:1 337:2	229:19 230:12	199:9,11,24 200:4	199:22 201:15	
340:20	253:22	200:11,12 201:18	202:10 205:9	K
investigator	itemize	johnson	206:2,17 221:21	kaplan
290:19 297:12	237:1,5	226:9,11	232:6 245:10	167:16 285:10

karen 241:21,23	338:24	224:13,14,16,17	337:9,15,19	169:10 202:17
karl 167:22	kept 178:1,4 382:5,6	225:8 229:18,21	338:21,24 339:14	204:2 208:14
karner 274:13	382:15 413:8	233:13,24 235:3	339:25 340:22	209:3 215:11,17
kassin 168:15 264:3,8	key 210:17 211:23	236:17 237:6	341:3,14 343:2,10	215:22 216:1
364:1,8	222:20 225:2	240:2,15,19,22,23	343:13,14,15	221:17 222:4,10
keeffe 165:13 166:7,24	kidnapped 291:11	241:11 242:1,3,14	345:11 346:3,4,10	231:12 239:16,23
231:15 232:3	kill 218:15	242:14 243:1,7	346:18 347:7	245:12,15,19
272:9 285:25	killed 216:23 217:4	244:8 245:9	348:24 349:1	248:10,11 251:5,9
295:17 307:4,19	killling 216:22	246:17 248:8	350:24 352:15,15	251:15 262:1,4,7
312:4 315:21,23	kind 303:11,11,18	249:22,22 253:10	352:16,20,22,23	264:1,6,12 270:5
315:24 318:25	346:1 347:5 349:8	254:5,8,22,24,24	353:5 354:1 355:9	270:9 271:10
319:11 320:5	kinds 347:14	254:25 255:9,16	358:20,20 359:4	277:22 278:3,7,15
322:14 323:4,14	knew 236:16,20 237:15	255:20 256:1,7,22	360:24 361:4,9,13	281:4,7 284:24
323:21 325:8	297:8 299:12	256:24 257:7	361:17 362:16,22	285:14 286:7
332:8 333:2	300:3,5 307:2,5	259:16,19 261:10	362:23,24 363:6	421:15 423:20
334:12 336:25	323:15,22 327:15	261:13 263:4	365:4,4 367:12	424:16
337:6,12 340:2,20	341:23 352:17	266:10 267:23	368:24 369:1,18	kofmans 363:23
341:4,19,21,22	357:13 360:3	268:3 272:14,20	370:14 371:17,22	korman 363:7
342:1,9,12 346:12	387:8 407:21	273:24 274:11	376:9 377:17	kris 351:4,6,8
346:13 353:9	know 169:19,22 172:23	275:2,8 279:2,24	379:3 381:25	kristin 165:13 166:7,24
354:14 359:18,22	173:9,10,16	280:24 281:24	386:25 387:5	231:15 232:3
360:21 361:15	174:16 175:1	282:21 286:1,9,14	390:25 400:5,21	272:9 283:8
364:20 365:16	178:21,22 179:4	286:16 287:15,16	408:16 410:10	285:25 295:17
366:9,17,23	179:10 180:3	287:18,24 291:13	412:18,22,23	299:3,25 300:4
keep 177:17,18 193:8	181:23 182:6	291:17 292:4,6,10	413:22 415:25	307:19 308:6
213:23,24 214:4	187:13 188:6,14	292:11,11,15,17	417:8 419:19	310:15 315:21
215:5,6 225:23	188:16,17,17	293:17 295:6,14	422:3	316:4,6,7,19,20
274:3 293:4	189:5,8,22 190:3	295:23 296:1	knowing 173:6 252:12	316:21,23 320:11
304:17 331:5	190:20,22 191:2,4	297:17,22 298:1	299:25	320:20 321:3
370:11 378:21	191:21 196:1	299:2,6,15,16,24	knowledge 228:2,6 287:3	322:3 325:8
382:3 387:10	200:6 201:4	300:2,3,9,12	323:7,8 339:13	327:14 328:24
413:7	205:15,18,21	301:19 303:16,19	346:7 352:13	338:2,4,6 343:16
keeping 387:3	206:1,2 207:15	303:25 304:2,6,8	361:15 363:25	346:12,13 350:20
keith 165:13,18 166:6	208:11 210:16	304:8,12 305:19	364:3,14,17	351:11 359:18,22
167:6 168:3,7,16	211:9,11 212:15	307:2,6 308:1,15	370:15 371:9	360:21 361:15
169:3 173:2	212:18,22,25	309:4 310:5	372:24 373:2,10	362:2 364:20
200:23,25 208:22	213:22 215:5	311:10,23 312:11	375:8 380:19	365:3,16 366:9,17
245:21 251:12,20	216:4 218:10,11	312:14,15,19	401:6 415:17	366:22
260:13 268:4	218:24 219:7,17	314:19 315:8,12	known 165:2 226:3	kristins 361:13
314:2,3 324:5,8	220:1,6 221:15	316:5,12,18,21,23	262:19 357:23	kunterre 219:22
342:15,20 425:2		317:2,6 318:8	360:10 376:20	
kendrick		319:7,25 320:1,5	knows 191:3 341:15	
		320:7 321:3,4,10	knox 240:21,23	
		322:4,4,9,17,22	kofman 167:7 168:3	
		331:17,19 332:13		
		332:24 333:11,15		
		333:17,18,19,21		
		333:23,25 334:3,4		
		334:10,11,23,25		
		335:3,11 336:24		

256:3,6,12	281:18 360:3,11	229:5,7 423:25	liability	283:18,25 419:9
laboratory	360:16 367:20	leaves	242:21,23 261:4	listed
228:25 229:7,14	369:14	305:12	liberty	267:17 419:25
lack	lawyer	leaving	232:23 386:21	lists
243:23	185:9 213:21	188:13 223:6,12	license	253:22 419:19
lama	265:13,15,17,19	224:24 226:12	426:23	litigation
371:16 373:8	265:20 266:1	lecture	lieu	220:22 222:6
lamas	285:9 287:24	386:9,9,10 387:9	330:5	236:13 237:18,19
371:14 372:8,18	347:7	387:10	life	237:25 244:16
landy	lawyers	led	173:15 223:10	328:9,13 363:14
167:17 168:4	215:2,3,7 356:10	376:5,19 389:16	229:23 230:2	366:1,12,22
285:7,9 286:19,21	lay	389:17	236:7 238:8 247:8	367:25 368:2,3,18
286:23 293:4,8,11	409:20 410:17	left	361:13 385:3,9	368:20,23
294:10,13 296:5	laypersons	224:10 226:8	387:16,19 411:19	little
297:1 301:4	266:6 267:3	337:20	417:6 422:21	198:5 200:25
302:12 305:20	lead	legal	lifes	210:24 213:9
310:20 313:4,6	389:23 392:23	230:23 248:23,23	198:20	232:7 263:12,17
320:16 321:1,13	leader	283:10 297:8	lifestyle	292:25 385:22
321:15,17,21	197:7	299:9 342:15,22	313:18	live
322:13 323:24	leaders	362:23	lifton	216:5 218:12
324:3,13 327:24	182:17 295:3	legionnaires	197:23	241:17 250:3
329:9,20 330:11	296:1	296:11	liftons	258:7
330:23,24 331:7	leads	legions	192:5	lived
331:10 333:7,9,10	193:13 201:21	355:21,22	light	341:12
343:19 351:13,20	learn	legitimate	255:14 325:9	lives
423:21	175:9,19 176:5	282:1,2,6,7	lightly	341:13
lane	295:3 296:2 334:5	legitimately	194:6	living
169:7	341:22 342:1	321:8 322:8	liked	230:5 422:1
language	386:14,23,24	legs	387:19	livingston
379:10 393:12,17	388:2 389:19	257:17	likelihood	165:24 167:13
large	411:25 418:1	leonard	200:10 201:10	llc
341:13 375:19	420:8,11	167:3 262:6	limitations	244:6,10
390:22 391:16	learned	264:14 271:21	175:14,23 282:21	llp
392:3	174:19 182:1	296:25 366:20	396:18	166:15,21 167:2,7
larger	228:22 307:15	letter	limited	167:16 285:10
339:6	315:14 327:9	196:3 215:21	282:10,16,17,19	located
latest	379:12 380:3	222:8 277:25	282:20 314:1	273:19 274:21
331:16	384:25 392:16,17	281:6 332:17,17	354:22	logic
laughter	392:17	332:24 333:2,3	linda	393:21
332:7	learning	362:10,13	231:17,23 232:4	logical
law	178:18 229:23	letters	line	405:10 409:4
242:15	230:2 385:1,3,10	197:2	254:21,25 326:24	logically
lawn	386:6 387:16,19	level	421:2 425:6	406:16
241:5	388:1,3,4,5,12	173:25 174:18	lines	long
lawns	389:2	224:20 228:3	197:5 315:13	172:5 173:2,8,12
241:3	learns	230:13 267:10	328:5 382:10,12	209:25 219:15
laws	178:7	380:16,20 405:2	382:19	228:24 245:7
254:19	leased	405:10 406:15	linguistic	252:14 268:20
lawsuit	193:25	levels	370:1,22	292:6,10 321:5
169:17,21,24	leave	219:5 392:19	list	322:5 352:22

354:2 382:10,12 385:22 408:17 423:16 longer 211:1 357:8,16 366:21 look 173:22 180:23 187:25 189:23 196:3 199:19 203:19 209:6 226:23 233:20 236:1 239:5 247:8 253:19,21 258:16 264:20 273:2,4,8 273:16 284:1,4 292:23 329:9 343:22 364:20 366:10,11,11,11 367:17 380:10 383:18 384:1 387:8 398:20 404:4 411:7 looked 205:23 319:17 340:25 341:14,23 342:2 362:11 367:14 405:20 looking 178:11 179:8 184:15,24 185:4 185:15 190:4,9 194:20 195:14 199:20 206:20 226:7,17 231:7 234:8 235:25 246:2 248:12 249:15,24 252:11 253:16 261:1 273:13 274:5 313:13 367:7 399:20 408:21 looks 185:8 264:17 341:17 383:23 415:13 loose 231:5 297:16 300:20 loss	222:19 225:2,12 losses 236:16,17,18 lost 220:4 222:22 224:17 416:7 lot 179:2,9 193:14 199:2 218:12 220:4 234:25 243:19 246:17 247:9 273:5 281:18 310:1,2,5 321:7,12 322:7,11 371:25 385:24 390:24 392:10,15 392:16,17,17 394:21 399:24 low 290:10 348:20 349:13 lowenstein 167:11 lowest 290:9 348:20 349:13 391:21 luggage 391:10 luis 277:5 281:11 lunch 270:7 luncheon 270:16 lying 349:12 lynn 370:7 lynne 168:18 330:14 <hr/> M <hr/> magazine 275:11,15 277:16 297:3 339:21 mail 211:20 main 233:6 311:24 maintain	274:10 281:2 maintains 206:24 major 220:7 233:6 277:7 majors 228:19 277:10 making 344:7 347:15,23 351:21 356:11 375:1 malintended 191:23 256:9 man 260:13 286:11 289:5 356:22 363:7 management 337:1 384:17 manhattan 384:21 manipulation 197:4 manipulative 186:7,14 manner 303:1 manual 193:3,7,9,11,12 205:3,8,9,9,10 399:25 400:1,4 401:2,20,22 402:17 manuals 192:17 manufacturers 391:15 march 165:19 166:17 239:8 251:13 324:19,21 338:16 425:4 march12 169:1 mark 170:3 171:12,13 171:15 204:16,20 204:21 215:19 239:16 245:12 251:9 263:24	293:8 323:25 324:4 329:21 marked 170:3,13,13 171:16,17 208:24 209:5 239:21 245:17 251:13,17 264:3,4 292:22 312:22,22 313:4 324:10 330:12,16 373:18 market 183:18 189:5 marketers 283:11 392:11 409:15 marketing 230:15,24 390:18 392:3 409:18,19 409:20 410:16,16 410:17 markets 284:8 marking 171:8 172:3 174:20 martin 165:7 167:15 190:12 193:3 199:6,10,10 200:8 200:11,12 201:7 202:7 212:20 234:11 345:13 397:2,5 398:9 424:11 masons 355:22 masters 227:5,9,14,18,21 matched 406:17 material 194:6 200:2 211:2 211:25 274:2 322:20 325:11 336:21 371:14 373:4 385:18 386:14,15 416:4 materials 183:13 187:14	194:12 210:8 224:11,15 237:14 242:17 264:23 265:3,5,9,11 266:5,9 267:5,12 267:15,25 273:13 274:6 322:23,24 323:1,4 325:15,22 326:3 364:18 370:11,13 373:12 409:20 410:18 416:10,12,14,14 416:15,22,24,24 416:25 math 170:22 171:23 mathematical 374:22 393:20 394:3 mathematician 171:24 mathematics 227:25 228:4 374:16 377:19 378:13,24 379:8 380:7,17,20 390:11,11 393:8 matol 231:1 matter 166:12 190:13 204:15 207:20 272:11 321:10 322:10 325:8 345:5 351:2 368:7 368:8 419:2 matters 198:8 337:11 matthew 314:11 maximized 378:12 mcgann 166:12 426:4,22 mcguire 166:21,21 192:10 202:13,16 206:10 206:14 231:11,13 248:9 262:5 263:25 264:10
---	---	---	--	--

286:17,20,22	266:11 267:11	374:24	385:16,23,23	422:16
297:20 321:13,16	269:13 415:21	mental	388:17 389:8,14	mine
321:20 323:16	418:8	378:14	390:8 392:22,24	329:3
327:23 328:1	meant	mention	393:2 394:20	minimal
333:5,8 337:3	202:23 266:5	222:2 310:13	395:25 403:20	375:18 377:4
344:22 350:4	296:1	315:9 318:17	411:5 418:22	minute
352:25 353:6,16	measurable	359:9	420:17,19,23,25	356:12 408:11
353:20 354:12,16	394:3	mentioned	methodologies	minutes
356:4,7,12 360:18	measure	215:16 255:22	210:11	174:16 330:2,3
366:5 400:13,16	229:10	276:20 278:16	methodology	343:8 369:9 371:2
403:4,7 404:7,11	mechanism	280:9 290:3 308:7	374:25 384:21	382:12 423:9
410:9 421:19,20	383:6	309:7 310:14,15	385:1 393:14,15	mis
424:6,12,18	media	320:12,21 332:10	methods	322:25
mean	290:1 346:15,16	359:6,19 419:19	175:10,19 176:6,9	miscellaneous
184:19 189:1,3	347:16,17,18,20	mentioning	176:10,11,12,13	261:2
207:2,5,7,9 214:4	347:21,21,24	359:7	176:14,23 177:2,2	mischaracterizing
223:25 224:4,4,5	348:6,12 350:13	mentions	177:11,14,15	319:19
230:18 236:11	medical	199:24 200:3,9,14	178:4 264:23	mislead
238:13 247:6	263:6 277:8	mentor	265:5,9 266:11	180:12,13
249:9 251:24	meditate	235:12,13,14	267:5,12	misread
257:2 259:13	296:19	merely	metroland	324:18
261:20 265:11,12	meet	177:10 385:17	334:6	misrepresentatio...
266:6 267:9 279:2	288:3 315:23	mess	mexi	347:24
280:8 281:21	316:8 317:23	369:3	372:2	missed
282:17 287:7	359:1 408:16	message	mexico	386:10
290:22 292:12,14	meeting	195:25	247:21,25 274:15	mission
294:1 299:5	168:18 292:6	messages	274:16 277:2	168:11 193:4
309:24 318:13	307:16,23 309:16	213:10,13,15,15	296:11 355:21	210:9,13 238:14
321:2 322:17	309:20 314:22,24	213:18 214:9	372:1,2	245:16,21,24,25
326:1 327:14	314:24 315:6,8,10	messed	mf	246:2 248:12,14
329:6 332:25	315:14 317:8,8,12	321:22	165:4	248:15 249:11,24
340:24 341:7,9	317:13 318:19	met	michael	250:1,5 401:7
344:24 369:2	319:12,23 320:1	258:1,12,13 288:1	364:11	402:8,16 411:12
376:24 377:16	330:13 358:10,11	288:4 292:17	microcomputer	411:16,17,20,25
380:1 387:1	358:12 359:9,13	305:3 307:14	230:12	412:16,19 413:12
400:10 404:1	408:15	317:17 318:11	middle	413:15 414:1,16
413:20 414:3	meetings	346:24,25 357:20	197:22 410:5	415:2,4,7 417:5
415:20 417:8	214:17,18	357:21,22 359:12	miles	417:10,12,17,23
418:6 419:24	member	360:25 379:4	214:16 216:15	418:1,7,9,12,15
422:15	317:24 335:5,9	408:17	million	418:21 419:1
meaning	336:6	metaphor	236:21,21 296:12	mistakes
253:24 254:12	members	246:15	384:4 391:6	199:20
262:10,11 266:8	197:10 267:22,25	method	millions	misunderstood
meaningful	391:17	202:20 275:4	236:12	403:16
392:7	membership	277:4 280:7,15	mind	mit
meanings	390:21 391:2,4	281:14 282:6	174:2 184:19	228:24 229:5,6,7
182:16,24	memorandum	370:17,23 372:9	196:17 212:8	229:12,18
means	168:13 251:11,19	373:3,8,11 376:2	374:22 383:3,5,12	mix
200:10 207:18	memory	377:21,24 378:1,2	384:4,5 393:17	290:3
246:7 247:7	208:13 311:21	380:22 382:7	406:2,7 415:21	mode

381:9 406:12	months	movement	189:17 231:16,16	near
model	233:22 379:4	372:4	231:17 268:3	182:19 274:13,13
197:16 383:3,11	391:9 418:25	moves	286:11 289:5	nebulous
383:11 406:13,19	moody	384:4,5	363:7 370:7	310:9
407:1,4,6,7 408:1	165:14 166:3	movie	names	necessarily
408:2,5,6 411:2	moribund	206:3	216:4 219:8,10	173:19 179:10
419:1 420:16,16	189:8 242:22	moving	230:16 295:23	188:21 216:5
420:20	morning	332:14 382:18	350:23	243:8 256:5 258:6
modeled	169:11 421:10	moxon	nancy	316:8 333:15
235:23	423:22	338:24	165:13 166:7,24	387:1
module	morris	mud	167:21 216:24	necessary
179:25 180:1	165:6 167:10	293:25	217:6,10 251:12	393:1 411:15
195:13 196:13,14	169:16	muddled	251:20 283:9	421:13
204:19 205:3	morristown	319:10	285:25 288:5,6	need
395:9 396:12	167:9	mulberry	292:4 310:14	169:14 170:15
398:2,14,17	mortgage	166:22	311:8,22,22	181:25 182:2
399:25 401:13,16	241:18,25	multilevel	336:10 350:19	191:21 211:8,14
411:23,24 419:19	mossad	390:18 409:18,19	359:1 372:20,25	217:4 233:15
419:21,22,23	291:10	410:15,16	379:4 408:9,12	249:16 301:7
modules	motion	murder	420:5,12	304:16 340:13
179:18,21,23	423:2	404:4 405:12,13	nancys	349:17 379:25
180:5 181:22	motions	405:14	217:10 288:4	needed
182:22 282:18,20	375:19	music	292:2 302:22	228:13,14,15,17
395:16 400:6	motivated	379:10	307:14 309:21	needs
415:25 419:3,9	172:8,9,22 234:3	musical	357:21,23 359:19	188:15
420:22,24	257:19 258:15	389:1	363:3	negative
moment	399:15	mystery	nashika	202:2,4 223:9
202:9 291:2 294:7	motivation	206:3 404:5	231:2	224:24 225:1
301:1 370:19	388:4,13,24 389:3	405:12,13,14	natalie	268:23 312:2,2
monetary	389:6 390:10	mystical	244:13 245:1	345:25
225:12	392:18 406:22	197:4	329:1,2 361:22,23	negotiate
money	motivational		362:1,4	390:23
185:15 188:23	419:17	<hr/>	natalies	negotiation
194:22 195:5,15	motivationally	naag	342:13 361:19	345:4
195:15 196:19	383:5	257:24,24	362:7	neighbor
237:24 241:18	motivator	naked	national	213:11 218:5
243:9 244:3 246:4	389:4	332:2	257:25 407:19	296:14,15 357:13
246:11,12,12,14	motives	name	nations	neighbors
246:21,23 247:9	304:2	218:23 232:10,11	277:7	214:21 216:3
247:10,14,15	mount	233:8 242:23	naturally	218:10 219:8,11
248:4 255:13,15	165:23	244:15 275:15	250:16	neither
311:16,17,25	mouthful	276:14 277:5	nature	423:20 426:16
350:11 355:25	240:2 324:7	278:19,23 285:8	195:16 196:8,20	nestled
398:2,14,17	move	286:13,25 291:1,5	250:24 274:19	283:25
401:13,16 412:2	266:18,20 302:13	291:6 295:13	282:3 292:15	network
419:22	302:23,24 356:20	315:25 336:10	297:15 300:18	226:8
monies	moved	342:16,22 387:18	325:11,15 365:7	neuro
247:1	230:11 341:12	387:19 395:14	375:24,24 378:12	370:1,21
monterrey	347:12 375:22	409:10	396:21,23 409:22	neutralization
274:15 277:2	400:17	named	410:19	186:1

nevares 276:19	175:8	212:12 214:19	273:24 274:10,16	272:16
never 192:2 215:16 222:7 226:2 229:6 244:10 253:14 295:24 303:16 307:3,5 313:20 326:6 338:9 348:3 348:5 360:7 361:18 365:25	nonadvertising 296:24 noncompete 187:6 190:1 noncompetitors 187:7 nonfiction 279:16 nonparticipants 175:18 176:5	218:9 230:19 244:18 252:3 253:18,22 258:20 269:4 272:12 283:24 294:19 313:3 321:22 324:17,24 326:13 327:17 329:19 350:21 371:7 391:2 401:12,16 408:15	279:22 280:12 282:25 283:3 285:19,19,23,24 286:3 287:4 288:19,21 289:2 290:1,21,23,24 292:13,22 294:18 294:18 295:2,6,24 297:6 298:15,25 299:19 300:22 301:12,24 302:9 302:20 305:1 308:1,5 312:11,22 314:16 315:3 317:24 318:9 319:15 324:6,10 325:14 335:16 337:7,8 339:15,18 340:4,12,21 341:5 343:10 345:22,25 346:6,22,23,25,25 347:6 348:6 350:2 351:16 352:20 353:23 360:1,3,11 360:14 361:3,8 363:1,9,13 364:17 366:1,3 367:1 373:4,12 385:13 391:24 394:15,16 394:18,19,20,23 394:25 395:3,16 396:21 406:6,10 413:16,25 414:13 416:4,4,9,10	<hr/> O <hr/> oath 169:8 271:7 345:18 oaths 426:7 object 206:10 248:6 268:8 297:20 337:3 350:4 360:18 383:21 391:20 objected 244:20 objection 206:14,18 318:10 318:15,16,18 319:1,5,12 327:19 356:20 objections 326:18 333:23,24 334:18 356:11 objective 207:14,15,17 393:23 406:23 objectives 333:25 334:20 obligation 248:5 412:3 observe 285:13 306:6 observed 233:23 obtained 319:22 335:1 342:10,13 obviously 330:18 occasion 214:23 occasionally 357:4 occasions 214:19 217:19 369:17 occurred 202:7 315:9 378:3 odd
new 165:1,24 166:14 166:16,23 167:5,9 167:14,18,18 169:7 230:7 242:7 242:14 248:4 253:15 254:17,20 274:12,13,20 331:17 341:16 345:7 355:24 380:22 406:12 421:2 426:6	nonsense 183:25 184:17 188:19 nonverbal 266:12,14 nonviolent 247:20 248:1 normal 202:24 normally 218:10,14 234:1 257:16 276:12 366:13 380:17	numbers 294:16 312:24,24 321:17 329:25 399:25 numerous 223:18 248:18,19 254:20 nxivm 165:2 166:6,24 168:17 169:18,21 169:25 170:6 172:12 173:17,24 174:24 175:20 176:8 177:18 178:1,4,5,7,15,16 178:18 179:18,19 179:23 180:16 181:6,7 184:1,18 185:1,2,7,11,21 186:21 187:4,6,13 188:17 189:8,8,10 192:15,19,20,23 193:20 195:7,18 195:20 197:14 201:19 203:7,15 204:13 205:13 211:4 219:22 220:15,16 223:23 224:11,25 225:12 226:14 232:1 235:1 249:12 250:5 255:7,17,24 256:14 258:25 259:6,7,24 260:6 260:10 261:7,9 263:6 264:16 266:21,24 272:5,6 272:22 273:3,15	nxivm9 313:5 nxivms 176:11 182:4,22 185:17 189:16 197:13 198:14 203:5 271:25 283:3,14 287:14 309:19 339:7 347:24 352:14 361:11 364:2,9 367:2 414:17 415:7 416:13,23 418:16 nycap	
newark 166:23	notary 425:24	172:12 173:17,24 174:24 175:20 176:8 177:18 178:1,4,5,7,15,16 178:18 179:18,19 179:23 180:16 181:6,7 184:1,18 185:1,2,7,11,21 186:21 187:4,6,13 188:17 189:8,8,10 192:15,19,20,23 193:20 195:7,18 195:20 197:14 201:19 203:7,15 204:13 205:13 211:4 219:22 220:15,16 223:23 224:11,25 225:12 226:14 232:1 235:1 249:12 250:5 255:7,17,24 256:14 258:25 259:6,7,24 260:6 260:10 261:7,9 263:6 264:16 266:21,24 272:5,6 272:22 273:3,15		
news 220:7	note 313:25			
newspaper 187:21 287:19 293:14	noted 382:20			
newspapers 287:10,13	notes 166:11 270:9 343:9,22 364:21 364:25 377:17			
nexttolast 246:2	notforprofit 256:8			
niagara 274:24,25	notice 292:24			
nice 233:12	noticed 421:16			
night 172:23 174:11 200:8,16,18 205:23 263:2 309:20 357:21	november 168:19 244:7 330:15			
nolan 291:5,5 292:13 308:11,16 318:7 319:21 327:13 349:21 351:11 352:4,18 360:11	nude 332:1 number 195:14 196:19 200:17 201:3 203:22 205:22 206:24 209:2			
non				

228:10	306:19 308:10	283:18 284:14,24	390:25	optimizing
odin	309:14 310:17,22	285:5 289:1	opened	374:21
278:20,22 279:7	314:13,20 318:7	292:10 293:2,10	189:9 277:9	options
280:17,20	319:21 327:13	294:3,6,14,25	354:19	241:20
offer	349:20 350:2,22	298:4,6,8,15,23	openended	orally
259:8 387:9	351:18 352:17	301:23 302:2,8	356:25 357:2	273:2
421:17 422:7,22	353:4,11,19,22	304:18 305:7,18	operation	orange
423:16	354:10,18 355:2,9	308:22 310:16	308:25 314:2	234:12,15
offered	360:10,11 365:20	317:21 318:25	317:22	order
391:19	365:21 366:20,21	324:3,18 325:20	operational	195:10,11,24
offering	424:10	325:25 328:21	230:3	196:8,10,11,13,14
386:6	okay	330:10,23 333:9	operations	202:15 205:5
offhand	169:16,20 173:2	336:22 339:3,14	381:17,20,21	233:23 238:10
218:8	174:5 175:23	344:21 345:8,20	393:21	278:9 354:19
office	179:16 184:15,24	350:9 352:6 353:3	opinion	394:4,7 397:12
228:7 274:12,13	185:4,14 191:9	353:16 354:15	183:24 258:13	398:2,4,5,16
274:14,15,20	192:4 193:24	355:2,6,7,13,15	290:4,6 300:19,21	400:4,7,10 401:11
275:1 330:7	194:20 195:5	359:1 360:13	300:22 301:12,16	401:15 419:4
342:24	196:24 199:17	361:13,20 362:9	301:25 302:10	ordering
offices	204:22 205:22	364:13 373:21	306:3 310:12	396:8,8 397:3,19
166:15 274:10,17	206:20 208:14	378:7,9 379:24	320:6,14,23 321:2	397:21,23,25
274:17	209:4,14,23	381:2 385:6,22	321:11 322:11	398:10,22 399:6,9
official	210:20,24 211:17	396:20 397:2	348:19,23 349:2,5	orders
330:8	213:9 214:13	398:23 399:8,19	351:15 353:21	196:12 394:2
officially	215:15 217:8	400:12,23 402:15	354:17 362:21	421:7 424:1
226:19,20	218:4 223:4	404:13,21 405:25	opinions	organic
oh	224:10 225:2	413:14,25 415:3	255:23 259:9	196:2
182:11 189:24,24	226:17 227:2,20	416:8 421:1 423:1	283:5 289:25	organization
193:18 203:23	227:24 228:1,24	423:6 424:3,5	341:18	178:12,13 200:1
206:19 217:2	230:5 231:18	old	opponent	211:24 223:9
221:25 222:16	232:6 233:9,18	228:3 379:2	321:11 322:10	224:21 225:8,25
229:8 232:4 234:7	234:10 237:13	380:19	opponents	228:8 242:17
234:10 246:18	238:3 239:12	olsen	255:3	249:8 257:23
272:25 276:2	240:3,16 241:7	283:13	opportunities	259:19 268:16
277:18 288:10	242:1,7,24 245:5	once	390:24	371:20 392:4
312:18 317:2	245:11 246:11	214:15 217:21	opportunity	396:21,23
321:4 322:4	247:16 249:11,15	249:14 255:4	390:19 392:10	organizations
331:25 332:7	251:5 252:11	291:25 321:25	oppose	230:16,17 244:19
335:10 350:7	254:22 255:2	343:3 378:22,23	344:12	organized
352:25 361:20	258:19 260:12,21	390:3 397:17	opposed	386:22
362:13 400:17	261:1,25 262:25	onepage	183:21 188:12	original
401:25 402:20	263:11 264:14	264:2,7	285:16 366:11	420:22,24
ohara	265:2,14,23 266:4	ones	390:3	originally
168:13 217:15	267:4 268:15	200:5 230:20	optimal	248:15 351:3
251:12,20 252:1	270:4 271:11,20	366:10 419:24	374:19 375:1	origins
252:10,23 253:8	271:22 273:12	ongoing	382:23 383:25	249:21
291:2,4 292:13	274:5,8 277:22	213:20 245:10	optimally	ought
297:7 299:8,14	278:3,16 279:12	306:18 352:21	377:3	344:14
304:15,21,25	279:22 280:10	358:24	optimized	outlet
305:1,1,3,4 306:1	281:7 282:24	online	375:17	407:19

output 381:16	page 165:16 168:23,23	paperwork 245:9 316:1,2	parentheses 313:25	180:18 186:2
outrageous 299:18	168:24,24,25	318:2 340:13	parenthetic 412:6	191:13
outside 199:19 266:20	175:12,13,25	paragraph 175:7,14 176:2	parish 219:4	participation 297:9 299:22
278:6 312:1	176:1 180:11	180:11 182:11,12	parishioners 218:21	300:2
336:23 340:15	182:7,11 191:9,10	182:13 186:1	park 166:16 167:5	particle 229:11
351:14 354:6	192:10,11,12	187:3 192:8	169:7	particular 181:16 193:3
363:1,9	194:24,25 195:1	193:16,19,23,24	parlato 286:25 287:2,18	236:15 262:20
outsiders 182:20 186:6	200:23 203:19	194:1 197:4,22	287:24 289:8,15	346:1 377:19
outweighs 261:5	204:14,15 205:8	206:20 210:5,25	289:19 294:1,2	381:13 402:12
overinclusive 174:6	206:22 234:4,5,6	211:19 212:2,16	295:18 300:21	particularly 303:21
oversees 235:14,16	240:6 253:16,18	216:21 222:19,19	301:2,6,11,20	particulars 280:14
oversight 225:20	253:21,22 258:17	226:7,17 228:1	343:10 345:21	parties 426:18
oversights 199:23	258:18 261:1	229:22 230:14	346:2,9,11,18	partner 314:14
overstate 290:16	264:9,15 294:16	231:7,11,12 232:6	347:8 348:17	parts 192:3 193:5 293:1
overstatement 354:16	294:22 295:1	233:2,22 234:4,5	parlatos 290:4 346:8	298:9 373:3,11
overtheline 254:12	296:23,24,25	237:10 240:12	348:19	377:20 392:13
overview 174:15	297:2,2,2 313:23	249:24 254:1	parole 230:11	395:18 400:1
owed 243:21	314:9 324:16,16	255:2 258:17	part 176:3 178:16	partway 179:14
owner 390:15	324:22 325:1	264:21 268:1,6,11	180:1,4,8 183:3,6	passages 211:1
	326:14,15 327:6	269:1 294:25	183:15 184:6	passed 391:16
	327:16,24 328:4	296:24 297:5,18	187:5 188:13	passing 335:19
	331:12 332:14	297:23,24 298:17	193:1 195:23	passive 251:1
	374:8 399:24	298:19 302:13,25	196:8 219:4 260:6	pattern 382:20
	400:2 401:1,3,4	313:23 324:23	290:13,13 337:13	paul 165:7 167:15
	401:12,16 402:7,7	326:14,24 327:2,3	339:6,23 345:3	190:12 193:3
	402:24,25 403:5,6	327:18,20 374:10	372:5 373:6 380:1	199:6,10,10 200:8
	425:6	374:12,14 380:10	380:13 381:5	200:11,11 202:7
	pages 293:14 330:15	380:14 382:18	384:11,13 387:2	424:11
	402:2,3	384:14 387:25	389:13 392:21	pause 300:25
	paid 225:16 241:18	393:8 401:9	393:20 406:8	pausing 305:17
	243:6,15 275:24	406:12 408:10	409:2 411:1,4	pay 241:8,14 243:5
	296:11 357:17	409:2 411:9	414:22 417:22	244:4 248:4
	pam 231:16	413:18 414:3	partial 213:7 340:7,9	
	paper 214:2 216:25	417:22 418:24	partially 335:4	
	232:7,10,12,20,21	420:2,15	participant 317:1	
	233:12,13 244:19	paragraphs 298:18 326:20	participants 175:8,9,17 176:4	
	299:10 302:16	393:3 394:12	178:8 180:12,13	
	409:2,10,13,17,24	400:3 405:20		
	410:13,21,25	411:7		
	411:1,4	parameter 382:23		
	papers 213:24 266:9	paraphrasing 326:2		
	319:17 364:10	parasite 419:19,20,20,21		
	369:8	pardon 353:2		
P				
p3658 203:22 204:2				
p3677 206:21				
pack 211:23 212:2,5,8				
212:10,15,23				
213:4 222:7				
package 415:21				
packs 212:4,12 213:8				
pad 303:7				

paying 311:14	316:18 321:5 322:6 350:21	405:4 406:14,15 406:25 407:6	342:10,13 401:1 401:19	plaintiffs 165:4 166:23
payment 241:19	351:7 369:4 371:19 372:1,2	408:8,13	photocopied 232:16	plan 181:21 246:5
pc 167:11	387:5,18 388:22 389:6,9 390:17,18	personal 207:13 220:18	photocopying 264:18	247:5,16,18 248:3
peace 372:4	390:21,25,25 392:2,12,18	325:11,15 361:13	photograph 332:10	315:22 316:24
peculiar 182:16	397:14 406:19,25 407:5,13,16,18,20	363:25 364:3,9,13	photographs 315:16 331:22	317:8 327:7 385:2
peddled 191:13	407:21,24 416:6 420:8,13	364:16 371:9	332:12	385:8 387:23
peer 275:4 281:14	peoples 246:13,22 349:7	personality 312:7 408:19	phrase 182:9,15 207:2	planned 316:16 317:21
peerreviewed 202:25	perceive 186:6	personally 240:18 329:5,6	247:5 267:8	planning 317:4 344:5
pending 360:4,17	percent 193:5 238:13	personnel 263:6	348:21	371:16
penis 332:4	386:18,18	persons 269:7,24 395:14	physical 388:3	plans 314:25 387:20
people 170:23 171:20	perception 384:9	406:17	physicist 229:4	play 223:19 335:15
183:12 184:8	perceptions 253:4,6	perspective 183:11 267:3	physics 227:25 229:8	played 377:2
185:11 187:4	perform 173:3	301:22 386:16	379:8 382:8	player 384:2
188:24 189:2,7	period 340:4,18 341:1	pertaining 283:10	383:14	playing 330:6 375:23
195:16 196:20	342:23 377:11,12	peter 167:12 223:1	picture 216:25 298:22	389:1
198:25 199:4,18	377:13	424:6	332:2	plaza 167:8
199:20,25 200:4,7	periodically 363:18	petry 167:22	pictures 266:10 309:9	pleasant 165:23
200:9 201:3,5	permission 225:24 245:2	ph 165:8 227:22	323:5	please 175:21 202:12
206:4 207:10	perretti 167:7	phd 380:16	piece 193:23 198:15	209:6 223:25
211:6,23 213:16	persistence 419:17	phil 286:12 295:12,17	341:10 389:1,1	251:9 286:6 301:5
214:18,18,19	person 170:24,25 171:22	philosophical 276:9 396:9	pieces 194:17 396:12	305:21 321:14
216:5,8,22 217:2	178:11,12 179:7	398:10,22 399:7	pigeon 347:3,5	323:17 351:23
217:17 219:8	183:10 186:13	403:2,10,12	piles 369:3,5,12	356:13 404:14
222:20 223:19	207:10,12 212:6	411:15	place 204:19 243:21	pleased 309:15 322:14
225:2,24,24 226:2	217:1,20 233:3,5	philosophy 180:5,8 255:3	247:4 250:2	pledge 246:3 249:25
232:11,16 233:1	234:1 247:7,8	305:2 379:9 380:8	253:12 265:1	plus 178:22,23 379:18
234:2 238:10	256:10 265:13	phon 395:14	353:20 359:13	poem 248:16
246:14,18,23	268:19 273:10,20	phone 165:24 192:9,14	426:14	poetic 248:21
247:2,14,25	277:11 286:15	192:18,22,24	placed 345:6	point 168:11 208:20
248:25 250:1,6,18	295:25 297:22	193:18 213:15	274:11 367:19	210:13 222:11
256:2 257:17,17	311:20 336:1	223:7 233:11,11	places	228:19 233:7
257:21 258:2,7	387:17 394:6	273:1,10 334:8	plain 234:17	236:11 244:2,20
259:7 261:21				
268:22 269:25				
273:15 276:16,17				
283:11,12,21,22				
283:23 284:1,4,12				
287:10 293:22				
296:20 299:17				

245:16,20 249:11 254:6 263:2 266:7 270:6,16 281:24 284:24 288:14 307:8,19 309:18 317:19 328:8 329:8,16,21 338:1 353:21 363:6 371:4 401:7,8 402:8,10,16,21 411:16,16,20,25 412:1,16,19 413:14 414:1,16 415:2,3,6 417:5 417:10,12,17,23 418:1,7,8,9,12,15 418:21 419:1 422:15 423:10	257:22 258:4,5,6 258:7 309:21 310:4,23 326:6,10 330:19 354:3,9 424:4	power 419:18	167:20 221:5 360:16 361:22 362:1,4	principals 242:23
points 383:22 401:8 402:10,13 417:13 417:13	positions 257:16,20 286:2 310:25	powers 352:11	presentation 266:18	principle 414:10
police 217:12,14,18 218:2 222:17	positive 221:14 253:1 268:23 287:11 290:5 307:22 311:1 328:22 339:19 345:21 346:5,5,17	pr 339:13 362:23	presented 196:10 401:14	principles 165:3 168:9,10 239:18,20,24 240:1 409:4 411:11 414:11
political 350:14	possess 325:11	practice 204:7 374:20,21 375:14 419:20	presently 243:13 274:10	print 220:10,17 278:25 391:7 397:19
politically 257:19 258:15 312:1 350:11 355:20	possession 215:6 366:2	practiced 406:6	preserve 220:25 271:16 272:6	printed 220:13,16 242:18 242:20
politicallyappoin... 257:16	possibility 214:12 248:19 259:18	practices 247:24 409:5	preserved 368:12	printer 242:15
politics 312:2	possible 202:6 206:4 224:8 246:5 249:4 252:22 330:9 335:10 360:6 392:9 422:13	precepts 249:8,10	press 225:1,4 279:4,6,7 287:11 312:2 329:8 339:19 345:22,25 346:1 346:17 350:12	printout 221:16
ponzi 409:22 410:20	possibly 206:5 275:9 327:14 338:2,3,6 372:16 376:18 397:14	precise 394:1,4 411:11	presume 310:16	printouts 365:8
portion 195:13 210:18 234:8 267:12 271:12 282:10,17 282:18,20 331:2,3 351:15 355:25	post 415:13	precisely 394:1	pretty 200:5 201:5 203:13 236:20,24 248:17 252:25,25 254:7,10 297:15 300:20 311:1,8 322:18 399:4	prior 307:16 346:22,23 359:16 361:7 366:7 426:8
portions 276:11	posted 187:12 210:8,15 210:16,19,21 238:20 239:1 414:17 415:7,15 415:25 416:5	precision 174:18	prevent 236:18	privacy 325:13 326:2,6,8
poses 331:23	potential 181:8,24 184:25 261:4	precursor 381:7,10,11 389:16 390:5	previous 170:12 205:19 303:23	private 207:13 249:5 290:19 291:6 297:12 300:8 308:12,13,16,18 308:19
position 176:18 181:9 183:17 189:3	potentially 192:20 193:13 205:6 267:16 308:17	precursors 376:10,12 388:18 390:2,8	previously 222:6 271:6 292:22 304:21 312:22 313:4 367:3	privatized 257:1,2
	poughkeepsie 384:22	preemptive 186:1	price 391:1,20,21	privilege 351:17 352:7 354:7,10,21
		preexisting 315:10 358:3,4	primary 276:5 337:7,9 390:15	privileged 336:20 355:12,13
		prefect 235:10,16	prime 235:15	pro 252:4
		prefects 235:17	principal 222:23 290:20	probab 220:16
		preliminary 281:17,21		probably 171:15 179:1 188:25 194:2 198:23 200:2 204:16 212:19 218:25 219:15
		premises 412:1		
		prepaid 230:23		
		prepare 387:20		
		prepared 165:22 330:7 344:18 421:22 422:9		
		present		

220:8 222:1	product	projection	171:5 173:14	purported
226:10 234:24	179:21 311:15,16	296:18 303:13	205:7,7	322:21
243:2 244:21	390:20,20 395:1,4	310:7	provisional	purportedly
255:19 256:19	397:13	projective	269:13	322:20
259:22 264:18	production	374:25 383:6	proximity	purpose
265:16 266:19,22	202:12 272:10	398:3 406:13	307:24,25	197:9,10 204:10
268:14 275:12	366:2	prominent	psych	232:20 333:11,13
277:18 279:17	products	277:11	205:20 281:22	333:15,17,22
280:8 290:14	391:6 397:8	promise	psychiatrist	purposes
340:25 342:25	420:24	175:8,18 176:4	190:15,17 262:23	267:19
343:16 361:21	profanity	177:13,17,21	262:24	pursuant
369:18 377:14	290:12,14,15,17	180:14 207:23	psychological	278:9 426:7
378:20 392:15	professional	promises	281:22,23 282:14	pursue
419:10	255:4,8,18	177:23	psychology	227:14
problem	professionally	pronouncements	254:18 379:9	put
173:9 194:5	360:25	197:8	psychotherapy	181:8 188:16
269:19 305:3,12	professionals	proof	260:18,22	192:4 193:2 198:3
381:19,21 399:16	407:23	409:5	psychotic	198:5 200:24
problems	program	proofs	262:14,18 263:4	213:15 215:2
381:19 383:13,14	188:1 224:3	394:4	public	221:8 222:4
384:25	229:17 235:23	proper	181:18,20,22	238:14 241:19
problemsolution	247:23 252:23	301:5	184:9,13 339:6	254:22 261:25
393:14,15	269:13 296:18	property	384:17 415:17	265:17 281:6
procedures	371:15 382:8,11	249:5 341:5,6,7	416:11 425:24	306:20 328:25
396:1,4 412:8	382:14 387:14	prophecies	publication	333:4 350:11
proceed	393:11 411:22	197:8	181:15,19 279:13	353:7 354:25
330:22 355:14	programmatic	propose	publicist	370:22 400:2
356:21	374:23 376:15,17	314:6	287:5,8	402:5 415:22
proceedings	384:8,10	proposed	publicized	puts
166:11	programmer	314:2,3	225:23	183:16
process	229:4 230:10	propriety	publicly	putting
172:4,24 202:24	programming	360:8,14	416:6	187:20 311:16
237:18 243:25	370:1,22 379:10	prosecute	publish	400:2
356:18 364:17	380:23,24 381:14	257:1	180:25 279:6	puzzle
393:18,19 405:21	381:25 384:16	protect	388:19	198:16,18 396:13
406:1,4,7	405:21 406:1,7,9	236:5,9 237:2,5	published	pyramid
processed	programs	237:14 238:6,11	203:15 232:13	409:21,22 410:18
384:25	165:3 170:5 182:4	protected	277:1,14 278:17	410:19
processes	192:7 231:20	205:3 354:20	279:7 280:20,24	pyramids
374:24	249:18,19,20	protecting	294:4	260:1
processing	265:7 285:20,25	237:16	publisher	
381:15	303:10 377:17	protective	278:23	Q
produce	382:2,3,5,7	265:24 412:8	publishing	question
264:12 321:14	399:22 406:10	proven	278:24	171:21 174:1
produced	prohibit	393:9	punishment	176:12 180:17,22
202:11 222:7	268:1	provide	419:22	184:23 196:11
251:18 252:1,2,13	prohibits	198:18 259:19,20	purchased	197:25 198:7
252:13 263:19	178:18	387:13 389:25	242:17 245:8	206:2,11,15
264:9 321:15	project	420:14	purple	209:14 233:4
329:23 365:25	229:9,18	provides	234:17	248:7,10 254:17

260:8,9 262:16	382:21	251:20 260:13	234:14 235:5,11	307:3,5 318:12
268:9 269:21	quickly	263:24 268:4	235:11,13	320:17,18 322:1
286:8 288:7,9	172:3 194:8	271:11 277:23	rapidly	323:16,18 325:6
293:15 302:5	248:17	285:8 292:21	201:2	326:22 327:3,20
305:20 308:21	quite	313:8 325:2,4,7	ration	331:2,3 351:24,25
312:16 313:8,11	206:4 209:25	325:12 327:8	284:15	362:18 374:13,17
317:3 318:14	214:25 216:12	328:9 329:21	rational	375:2 380:13
319:4,8,11 323:13	247:21 252:14	331:22 342:15,20	172:11 275:3	381:1 383:8 385:4
323:20 326:11,23	279:20,21 291:12	344:2,3 345:1,11	277:4 280:7,14	388:8 393:6 394:9
331:2,4 336:4	305:19 307:21	371:9 414:8 425:2	281:14 282:6	399:2,4 403:3
337:4 338:11	346:19 390:22	ranierel1	370:17,22 372:9	404:15,18 405:3
341:2 350:5,14	quote	168:7 208:24	373:3,8,11 374:20	407:2 409:8 410:7
351:22 352:7	171:21 192:16	209:5 373:18	375:4,8,10,14	410:9,10,11 412:5
353:18 354:25	193:2,8,8,10	405:23	376:2,6,7,11,20	412:13 416:20
356:8,17,23,25	194:3,4,21 195:9	ranierel2	377:21,23 378:1,2	418:4 419:6 425:3
357:2 360:19	195:15 198:2	168:9 239:17,21	378:16 379:13,17	reader
370:18 373:9	203:2 204:5,7,17	239:24	379:20 380:4,5,5	405:7
375:6 381:20	204:18 205:10	ranierel3	380:21 381:3,5	reading
384:7 387:6 389:3	298:1,5 301:5	168:11 245:18,20	384:12 385:10,15	172:25 182:5
392:6 403:15,16	332:15 354:17	ranierel4	385:16 388:17	185:5,16 198:25
403:17 404:10,14	quoted	168:13 251:10,14	389:8,14,18 390:8	212:11 237:10
404:20,21 410:9	196:18 197:23	251:17	391:23 392:14,22	251:25 254:1
410:10,13 414:13	205:9 398:5,7	ranierel5	392:23 393:2	263:17 303:4
419:4 421:11	quotes	168:14 264:4,7	394:13,17,18,19	318:2 349:3
questioned	171:19 172:1	ranierel6	394:21,24 395:2,4	399:12 412:10
218:25 345:1	193:15 194:2	168:16 293:3	395:12,17,20,20	reads
questioning	197:25 204:15	324:2,4,11 328:25	395:22,24 397:8,9	254:4 313:25
330:22 344:2	205:2,8,12 298:2	ranierel7	397:13,14,15	328:8 405:4 409:2
345:14 421:2	298:3 401:10	168:18 330:16	403:20 406:6	real
423:19	quoting	ranierel5	407:8 411:5	287:5
questions	198:8 401:11	171:9 172:7 173:5	418:22 420:17,18	realize
196:12 228:10		175:5,13 192:4	420:23,25	190:25
256:19 270:5	R	194:9 205:20	react	really
271:12 284:25	raise	ranierel6	312:4 348:14	188:1 307:2
285:3,12 298:16	180:17 381:20	171:9 192:5	reaction	311:16,25 312:9
306:21 310:19	raises	194:20 195:3	310:23 311:6	325:23 388:2
327:21 340:1	180:22	203:18,20 204:2	read	realtime
343:24 344:3	ran	400:15,17,23	181:25 183:13	166:13 426:5
354:14 356:21	244:15 325:2	403:6	184:17 187:14	rearrange
363:23 374:14	random	ranierel8	193:16 200:7,16	422:20
393:7 394:4 396:8	199:22	170:4 174:11,21	200:17 201:12	reason
396:12,13,18	ranierel	399:21 400:18,19	208:3,5,8 210:25	185:10 188:4
397:4,11,19,21,24	165:13,18 166:6	ranierelreexhibit	211:7 238:1	193:2 202:4
397:25 398:1,3,3	167:6 168:3,7,13	330:12	240:13,15 252:18	223:12 224:23
398:7 403:13	169:3,11,16 173:3	ranierelres	273:1 293:24	246:13 281:13
quick	173:11 174:23	168:16 324:5,8	297:4,4,24 298:3	293:8 295:20
185:13 285:17	186:20 200:23,25	rank	298:10,17 300:4,9	301:20
302:15 326:23	202:10 205:22	223:2 234:12,14	300:23 301:9,12	reasonable
327:21 378:19	208:22 209:4	235:7,9	301:17 302:6	201:14 341:16
quicker	245:12,21 251:12	ranks	303:5 305:20,22	reasons

281:15 293:23 295:22 reath 166:15 167:2 rebuild 259:25 rec 379:16 recall 209:23 210:2,3 211:16 212:8 213:4,7 240:23 251:24 254:1 257:11 260:11 288:13,16 289:11 313:15 318:16 325:3,4,7 352:12 353:24 359:24 367:4 372:11,13 372:15 419:8 receive 280:3 received 208:23 212:25 213:10,13 218:4 221:22 233:13 239:20 245:17 251:13 264:3 279:12,25 322:20 324:10 330:16 338:21 receiving 313:15 368:15 recess 208:21 270:16 329:17 371:5 421:10 422:10 423:11 recipe 179:15,16 379:17 recite 417:23 recited 249:12,14,19,20 249:22,23 recognize 209:8 245:22 313:9,12,13 324:14 recognized	191:15 219:10 recollect 289:17 recollection 239:6 352:12 recopies 402:14 record 169:4 208:19 215:11,19 222:5 239:15 251:6,8 270:12 271:4 294:12,18 298:3 324:12 325:6 328:2 329:11,14 330:5 333:6 344:1 344:9,24,25 345:6 353:7,25 365:25 373:25 374:1 393:6 399:1 410:2 421:24 422:7 423:13 424:7,22 recorded 358:11 recorders 391:11 recording 168:18 329:22,23 330:13 recordings 273:7 records 228:15 332:21 342:10,13 recreate 397:15 recruit 250:15 red 332:3 redefine 187:15 redefined 182:16 redirect 168:2 redirected 406:23 reduced 382:16 383:1	refer 212:2 229:22 231:7 232:7 240:17 275:13 306:22 317:4,7 373:17 reference 256:6 353:18 355:1 402:8 referenced 216:21 256:7 399:24 400:6,7,11 references 240:10 400:3 referred 232:12 362:11 401:18 409:12 referring 201:17 212:16 213:14 222:25 226:8 237:12 238:2,4 239:2 265:3 282:15 285:19,24 318:5 327:12 332:24 381:11 383:11 394:23 407:4,7 415:3 refers 253:12,16 255:2 258:20 401:19,21 refine 418:25 420:3,13 refined 383:2,10 384:25 419:3 refinement 420:10 reflect 344:1,25 417:24 418:11 reflected 376:1 reform 192:6 refresh 239:6 refunded 412:2 regard	261:4 registered 237:17 registrars 228:7 regret 303:7 regretted 303:3 regulations 402:17 reinterpret 197:7 relate 242:12 298:16 368:19,23 381:16 related 177:2 179:23 241:12 272:13 351:11 352:4 relates 244:8 285:21 390:11 relating 170:25 171:1,2 181:6,7 186:12 191:19 256:19 281:19 340:23 346:6 366:12 367:20 368:1 371:11 381:14 389:7 409:18 410:15 418:23 relation 402:16 relations 339:6 relationship 303:23 309:19 312:12 315:10 339:21 351:16 353:11 354:23 358:3,4 359:16 361:7,10 relative 426:17 release 173:22 191:25 192:2 193:14 238:12	released 193:9,11,13 releasing 193:8 relevant 219:18 221:2,8,11 reliable 321:9 322:9 religion 255:5 remember 212:5 213:1,3 218:8,24 230:21 236:22 257:7 308:22 316:9,13 318:24 319:2 328:16 335:17 357:11 358:1 364:11 365:10,12 377:15 419:12 remembered 409:11 remote 242:16 renting 229:10 rents 273:20 repeat 169:14 175:21 180:7 189:19 222:8 290:8 386:23 423:24 repeated 404:14 repeating 290:11 rephrase 286:10 297:21 308:20 317:16 337:5 replace 363:18 388:3 replacement 363:20 replacing 368:9 replicate 172:11,14,17 177:7 193:20
---	---	---	---	---

replied 303:6	request 168:23,23,24,24	respected 247:2	361:3	325:10,14 328:12
report 202:25 212:20 217:12,13,16 218:1 222:14,17 244:25 328:11,11 328:14 334:8	168:25 215:17,24 221:17,19 222:8,9 272:14,15,19 273:5 277:23 278:4 281:4,8 344:15 365:24 423:3	respond 221:24 290:1,2	retreat 165:8 167:15	330:14 334:7,9 335:9 338:2,5 339:5 341:11
reported 223:15 231:4	requested 168:22 222:6 273:3,4	responded 301:21 305:7 424:10	return 224:10,15 225:17 226:14 314:22	358:3,6,6,19,21 359:5,16 362:15 362:19 363:25 364:8,18 371:10
reporter 166:13,14 245:14 301:10 302:7 305:23 320:19 322:2 323:19 324:2,4 334:7 352:1 404:16,18 410:12 416:21 426:5,5	requests 272:10,17,21 366:9,15,16,19,23 369:19	response 239:25 240:12 245:4 257:14 324:23 326:13 327:17,24 340:8 363:23	reveal 170:24 171:1,3,22 171:24 178:8 180:24 181:12 183:17 187:18,23 188:3 198:1,11,14 205:13 210:10 244:17 269:2 397:3 398:10	ricky 165:7
reporters 287:10,14,19	requirement 263:9,10	responsibilities 230:13 340:4	revealed 186:19,19 205:17 205:25 206:8 226:4	ridiculous 316:12
reporting 165:23	requires 178:1,4 286:5	responsibility 241:16	revealing 186:21 187:1 188:8	right 176:9,25 181:14 192:16 199:8 207:15 213:1 217:10 233:17 235:8 247:20 262:4 278:8 295:9 301:19 302:23 303:4 306:2 307:24 317:14 321:20 323:24 324:22 325:13 326:2 327:6 328:25 330:11 343:21 345:22 349:23 356:2,22 364:2,22 367:18 371:12 374:7 396:2,9,15 402:6 402:11,20 406:4 407:6 412:15,17 413:11,20 414:17 414:21 415:12,19 424:18
reports 391:18,19	reread 301:4	responsible 241:21 304:4	reveals 183:14,15 205:10	
represent 285:10 293:12 295:9,16 329:22 345:12 348:6 363:13 403:9	research 228:10 229:3,3 281:16,16,20,24 281:25 282:8,11 417:4,8,9	responsive 273:13 369:13 404:10	revelation 325:9	
representation 259:12 330:21 393:23,24	reserve 353:9	rest 344:6 354:3 411:17	review 209:17 259:23 265:14,20 266:1 275:4 281:14 313:1 343:9 371:15 422:5	
representations 258:20,24 259:2,6 259:10 358:12	reserved 380:18	restrictions 281:19	reviewed 265:16	
representative 277:6 336:6 355:23 371:15 372:8,18	reserving 353:14	result 182:19 225:13 244:21 355:12	reviewing 175:3	
representatives 416:5	residing 169:6	results 203:1 291:19 307:15 309:15 311:19,23 349:25 358:8 396:2,5,7 403:21 405:1	revision 264:19	rights 353:10,14
represented 173:20 255:17,20 256:11 265:6 303:22 314:16,18	resolution 247:21 248:1	resume 421:6 422:10,17 423:21	ribbon 332:3,11	riker 167:7
representing 403:11	resolve 392:11	resumed 271:7 344:14	rick 165:7,10 167:15 167:22 168:16,18 190:10 200:13 202:2,4,8 220:1 223:8 289:20 290:2,4,7,9 307:10 308:2,5 309:8 317:8,12,13 319:13 324:5,9	ring 252:16
reps 232:22	resolved 254:8,10,16	resuming 421:10		rituals 191:20 411:24 419:13
	resort 315:24	retained 277:20 360:2		rival 384:2
	resources 246:4			road 274:14
	respect 224:20 228:18 258:14 260:8 286:2 306:10 311:23 314:4,7			rob

287:16	316:17 317:8,13	402:17 411:24	sashes	schedule
robbins	317:17,22 318:10	419:13	234:14	421:18
190:13,18,23	318:11,19 319:13	rulings	sat	scheduling
191:7 193:17	319:23 321:6,6,11	354:4	261:9 417:19	387:12
269:16	322:6,7,10,20,22	rummaging	save	scheme
robert	322:24 324:5,9	304:10,13	188:18 213:18	409:22 410:19
167:3,17 192:5	325:10,14,23	rumor	221:11,13	schemes
285:9	328:12,19,19	218:18	saw	409:21,23 410:18
robertson	330:14 331:21	run	202:2 203:3 208:9	410:20
286:12,14,18,19	332:1,6,9,15,16	216:6 280:25	208:10,12 268:3	scherer
286:20,21 295:3,6	332:25 333:11,12	339:22 382:9	297:11 300:7	167:7
295:12,12,18	333:20,20 334:1,2	419:10	302:19 316:2	school
297:6,17,23	334:5,7,9,14,20	runs	319:15 338:9	192:25 259:1,12
298:13,25 303:6	334:21 335:1,9,18	330:2	364:10 389:20,22	259:14,15,17
robes	335:24 336:7	rutnik	saying	380:18 385:2,9
235:19	337:13 338:2,5	314:14	172:24 179:12	386:5 387:16,21
robinson	339:5,24 341:12		183:13,24 198:20	411:14
286:17	341:20,23 342:2,4	S	199:4 207:19	schools
rochelle	342:7,10 345:12	sacred	230:24 247:8	235:15,17 277:8
165:6 167:10	348:18,19 349:12	247:14	253:3 259:17	science
169:20	354:18 358:3,6,6	saddle	268:3 299:18	227:3 303:17
rojas	358:19,21 359:6,7	383:22	301:16,23 302:8	384:16,24
276:22	359:10,13,16	safe	306:12,13 309:8	scientific
roll	360:2,3,15,15	266:23	320:11,20 322:17	197:16 202:1,20
243:12	362:15,19 363:25	sale	337:25 359:21	202:24,25 275:7,8
rolled	364:8,18 371:10	246:16	394:6 402:6	275:9
244:1	424:12	sales	405:11 409:11	scientologists
rolls	row	230:16	414:9 424:14	338:22
242:22	285:2 408:18	salzman	says	scientology
romantically	royalties	165:13 166:7,24	175:17 177:12	219:25 220:2
329:6	279:12,25 280:4	167:21 168:13	180:11 183:22	335:6,9,25 336:1
room	rpi	235:9 251:12,20	191:12 193:19	336:7 362:20,21
268:5	226:18 228:7,16	253:8 285:25	195:15 206:24	screamed
roseland	228:19 229:16,19	288:5,6 306:24	207:20 210:7,25	214:20
167:14	379:7,13,16,16	311:6 318:17	211:22 218:4	screen
ross	380:15	334:16 343:17	221:3 222:22	383:18
165:7,7,7,10	rpis	408:9,12	225:3 226:7 228:2	screwdriver
167:15,15,22	228:4 380:20	salzmans	230:14 236:4	389:21,23,24
168:16,18 190:10	rr	314:25 359:2	238:5 239:8	se
200:13 202:2,4,8	272:16	sand	240:12 249:25	172:16 256:6
220:1 223:8	ruff	397:10	261:2 264:7,23	259:14 260:6
289:20 290:2,4,7	233:8	sandler	265:5 266:11	273:16 290:8
290:9 299:17,18	rule	167:11	267:4 297:6	316:19
303:23,24,24	267:11 268:12,13	saratoga	298:13,20,25,25	sean
304:2,22 306:7,11	269:5 270:1	314:12 384:21	304:4 313:16	335:13
306:13 307:10	283:16	sash	327:7 332:15	search
308:2,5 309:1,8	rules	234:12,15,16,16	340:23 393:8	219:15 274:8
309:16 311:24	169:11 191:20	234:17,17,18,20	401:1,2,4,14,15	351:11 352:4
314:5,7 315:5,7	269:19 285:14,17	234:21,23 235:7,9	411:9 412:7	367:4,6 369:10
315:11,15,23	305:10 345:13	235:12,12	417:22	383:2

searched 367:11 369:12 411:19	205:13 226:1,5 323:1 378:21 382:4,5,6,15	272:14 291:20 293:5 294:25 298:2 302:21	296:12 355:24 358:16	392:8
searches 369:21	396:22,25 412:17 412:20,25 413:2,4	327:6 328:21 329:9 336:16	send 245:5 424:13	served 272:10
searching 383:20	413:6,8,8 414:21 415:8,9 416:9,15	341:17 362:17 382:20 384:1	senior 235:14,17	server 219:23 220:3,8,15
season 292:17	416:25	387:9 402:4,6 405:12 408:2	sense 185:10 207:6 249:1,1 250:25	service 228:10
second 168:10 169:2	secretive 194:6	412:7	315:4 320:13,22 323:2 361:5	services 208:10 230:12 318:21
182:7,11 185:23 195:9 228:1	secrets 171:10,14 172:6	seed 332:20	378:25 383:3 406:21 417:6	session 204:7 253:11 258:22 259:6,25
237:10,23 239:19 240:1,12 302:14	173:22,23 174:7 174:21 176:24	seeing 175:25 212:5 221:21	sent 211:23 212:5,12 212:15 220:11,15	260:10,15,18 261:19 262:10,12 266:25
313:24 317:3,16 317:22 329:11,12	177:3,7 178:9,12 178:14,14,19	seeking 250:6 319:23	245:6	sessions 253:25 254:12 255:18,25 256:15
332:14,15 333:5 356:13 374:17	183:3,9 184:8,13 184:14 186:18,19	seemingly 402:19	sentence 174:1 176:3,8 177:6,8,10 181:1	258:25 259:7 261:7,9 268:3
375:17 377:7 384:4,5 402:4,25	186:22 187:1,8,9 187:24 188:8	seen 206:3 212:3,12 240:4 248:20	181:4 182:21,21 185:16 186:5	set 168:10,16 239:19 240:1 246:20
403:5	189:23 190:4,9,19 190:21,24,25	251:22 252:6,12 252:17,19 283:24	189:19,24 191:12 191:18 198:13	282:11 324:6,9,20 374:22 381:17,22
seconds 200:14,22 330:2,3	191:24,25 193:10 194:10,19 196:9	293:16 299:10 302:16 308:7	210:7 211:22 213:10 228:2,2	389:17,19 393:20 393:21 408:20,21
secondtolast 324:16	197:3,20 198:10 205:6,16,24 206:5	311:4 313:20 316:1 322:16	236:1 246:3 249:25 265:4	426:14
secrecy 416:7	206:7,12 223:12 236:10 237:2,5	326:7 335:21,23 336:2,5,9,14,23	295:2 298:23,23 301:17,21 313:24	
secret 170:6,21,23 171:3	269:3 280:12,18 397:15 407:9,12	337:16 393:22	328:5,6 388:10 396:3 405:16	sets 312:23
171:4,22,24 172:14,18 173:4	412:22,24 414:25 415:1 416:13,23	sees 247:7	sentencebysente... 189:20	settled 203:10
173:13,18,19 174:2,14,23	418:16,20,23	segment 171:5 321:18	sentences 186:18 198:2,3	settlement 201:13,16,18,20 202:11,18 203:2
176:17,20,21 177:15,17,18	section 194:22 253:20 277:15 294:23	seiler 167:16 285:10	separate 233:11	423:18
178:1,4,23 179:1 179:4,11,13,24	330:1	select 308:17	separately 237:21	severalfold 390:17
180:2,21,24 181:12,13 183:4,5	sections 386:7 395:6	selection 382:23	sequence 352:13 356:3,6 357:2,4 358:1	sex 309:10
183:7,10,14,16,18 183:22 184:5,7	security 217:1,3	selfdeterminism 406:22	360:5	sf 168:12 245:17
185:23,25 186:10 187:18 188:3	see 176:2 181:14 187:22 202:16,21	selfesteem 259:21 419:16	series 204:14 298:16 357:18 400:7	shape 414:13
189:13,18 191:17 193:12,14 194:1,5	204:4,14 212:1,10 230:24 233:18	sell 390:20 391:3	seriously 311:9	share 250:1 276:15,16 276:17
195:20,21 196:1,7 196:22 197:1,13	237:9,12 240:10 250:21 254:3	selling 188:22	serve	shared 350:18
198:1,4,14,22 204:13 205:3,11	267:2 270:9	senator		

shares 350:19,20	sign 268:20 389:10	sitting 172:2 261:7 266:4	socialism 256:24	sort 170:20,21 176:25
sheds 255:13	411:22	399:12 419:8	socratic 385:23	177:1 197:19
sheila 226:9	signature 209:12 324:17	situation 197:22	soft 191:13	198:5 202:5
shift 400:24	signed 168:7 208:22	situations 208:2	sold 279:22	225:22 233:11
shifter 186:9,13,14 256:5	209:18 236:24	ski 388:2	sole 186:8	241:2,3 242:18
shingle 189:9	238:22 239:4,8,9	skolnik 167:12 168:4	solid 281:16	262:14 274:18
ship 316:11,11 317:9	244:14 324:20	202:9,14 204:1	solomons 282:13,14	281:24 291:11
317:11	significant 179:4	302:4 310:18	solution 173:9 383:25	296:19 305:8
short 208:20 293:1	signing 209:24 248:25	313:3 331:5,8	solutions 206:5	310:7 311:12,20
329:16 371:4	373:4,12	344:1,17,20,24	solve 173:9 381:18,21	311:25 333:14
406:22 421:9	signs 411:22	345:10,12 351:24	383:13 399:15	362:24 390:24
422:10 423:10	silly 221:4 388:24	353:15,25 356:7	somebody 179:12 183:13,22	416:16 417:1
shorten 323:3	similar 177:23 178:22	356:10,24 357:1	184:21,24 185:4	sorts 201:4 202:22
show 175:11 209:4	235:19 389:19	365:24 366:8	185:14 186:24	337:25 383:22
234:2 236:24	391:1 394:3,5	371:1,8 403:5	275:18	sound 303:21 310:8
251:16 256:8	401:17	404:9 410:4,7	somebodys 183:24	sounded 310:4 320:2
272:9,22 292:21	simple 236:24 291:19	416:18 417:3	somewhat 235:19 267:20	322:17
312:21	349:24 351:9	421:1,14 422:12	317:9 346:12	sounds 252:22 285:16
showed 272:18 387:24	352:2,10	422:23,24 423:6	son 192:24	286:13 300:4
shower 309:10 332:12	simply 172:12 349:7	423:14 424:9	sorry 177:5 180:7	316:16 375:19
showing 293:12	sing 356:15	slander 326:5	192:12 194:24	388:24
shown 272:12	single 172:17 189:24	slanderous 306:12	203:24 232:4	sources 338:18
shuffled 244:19	264:9 421:16	slave 246:16	239:9 265:2	sp0554 312:24
shut 220:7	sir 194:20 293:12	slaves 246:16	272:24 276:1,2	space 193:7 383:17,21
sic 231:7 238:13	324:14 343:23	slide 285:3	283:1,2 284:9,13	spanish 275:16,17,18
251:17 260:1	sit 189:24 261:3,18	slightly 295:5	296:7 302:4	speak 176:21 197:19
296:23 331:23	296:19	slip 259:16	305:13 310:20,21	212:13 225:6
332:19,22	site 220:1	small 205:7 280:25	314:3 321:24	275:17 276:1,8,8
side 197:5 243:24	sites 226:24	292:24 341:12	323:2 328:1	285:15 287:13
264:13 311:18	sitrick 339:9,10,12,14,17	smartest 260:13	331:18 339:4	288:13 289:8
sides 243:24	339:20,23	smith 231:17,23 232:4	341:25 342:18	293:18,21 309:1
		snyder 351:4,6,8,12	352:25 374:12	334:12,16 358:9
		social 315:4	385:22 399:14	380:3 401:5
			402:24 405:17	speaking 174:12 287:19
			415:23	300:22 301:3,6,11
				347:20
				special 234:2 391:10,13
				391:15

specific 170:18 195:10 207:16 212:8 283:19,19 305:6 306:5 311:19 320:10 339:19 366:10,14 378:4 393:24 415:12	305:6 310:8 315:2 334:7 347:12 375:22 spoken 259:11 283:21 289:15,19 291:22 293:22 299:17 330:4 335:5,8	400:2,4 411:15 422:5,5 started 230:9 231:9 243:1 375:23 376:3,4,11 376:12,13,14 380:16 384:7 388:13	411:20,25 412:16 412:20 413:12,15 414:1,16 415:2,4 415:7 417:5,11,12 417:17,24 418:1,7 418:9,12,15,21 419:1	299:16,23 300:1,1 303:11,18,20 304:9 314:1 317:5 317:9 358:9
specifically 171:25 173:20 196:11 198:6 211:11 257:4 269:21 272:4 313:25 315:2 316:22 346:3 365:5 367:1 368:6 398:14 400:6 401:10,14 407:25 417:10	spokesman 295:2,6 spokesperson 295:24 sports 255:4,8,18 spout 185:17,19 spouting 185:22 spring 338:13 spy 296:20 stafford 370:7 stage 317:22 stagger 386:8 stamp 203:22 252:3 293:5 stamped 168:12 245:17 stand 250:22 271:7 standing 198:13 204:12 205:13 332:2 start 169:2 176:19 180:23 187:23 188:3,4 193:21 269:14 275:21 287:12 292:7 301:7 310:16 322:21 325:21 326:20 333:24 334:19 335:22 336:4 341:2 344:2 374:19 399:2	starting 176:25 196:7 227:12 298:13 331:11,11 382:19 386:7 389:19 400:18 starts 172:1 174:15 176:12,15,21 179:5 183:2 184:4 196:8 197:19 198:6 200:23 269:20 295:2 298:21 325:2,4 326:17 327:18 328:5 331:13 381:20 state 166:14 207:12,14 228:12 230:7 242:8,14 248:4 254:17,20 257:5 257:15 384:17 388:25 389:2 406:2 419:17,17 419:18 426:6 stated 299:22 305:9,11 325:14 391:20 statement 168:11 180:22 184:3,6,10,12 188:9 193:5 194:21 204:12 210:9,14 212:7 238:14 245:16,21 245:24,25 246:3 248:12,14,15 249:12,25 269:17 269:18,20 351:21 401:7 402:9,16 411:12,15,17,18	statements 188:7 203:13 209:20 332:9 347:15 358:16 states 165:1 234:11 254:18,21 257:9 332:18 395:9 stating 347:16 status 328:10,11,14 416:9 steal 190:24 stealing 255:13,14 stem 284:6 stenographic 166:10 stenographically 426:13 step 233:15 393:9,9,13 393:13,16,16 411:10 413:15,19 413:22 stephanie 165:7 168:9 169:23 194:12 208:3,5,8 239:19 239:25 371:11 steps 401:11 413:21 steve 347:3 sticker 313:5 sticks 233:14 sting 297:9,10 299:12	stinks 188:2 stipulate 353:12,13,14 stop 296:15 302:14 356:22 421:4 424:2 stopped 189:7 357:14 storage 273:14,19,21,22 367:8,9,11 stories 303:8 346:5 355:19 story 357:7 strange 200:5 strategically 383:6 strategies 186:13 strategy 191:22 street 166:22 233:6 strict 268:25 strike 177:21 178:2 185:6 206:8 208:4 211:17 223:13 224:22 252:4 279:15 281:12 287:16 292:7 315:5 326:11 356:20 strong 203:13 289:25 346:16 388:4 strongly 277:12 struck 200:7
specifications 402:22 specifics 170:17 416:15,25 specify 352:9 speculate 333:16 speech 377:4 speed 422:4 speedwell 167:8 spelled 276:19 spent 174:16 175:2 236:4,8,11,19 237:2,8,24 238:5 238:25 371:19 408:15 423:17 spew 184:17 sphinx 278:20,22 279:8 280:17,21 spiritual 197:6 spoke 288:16 299:14				

structure 182:24,25 196:16 196:16 256:24 276:10	275:3 281:13	403:6	236:18 269:18 295:23 311:9 333:13 343:18 372:10	370:4 371:1 373:21 378:24 380:16,19 386:8,9 386:10,15,19,22 387:7 411:24 421:11 422:15 423:9
structures 231:6	subscribed 425:22	suppose 196:1 386:5,8	suspicion 350:10,11,17,18 350:19,20	takeaway 311:15
stuck 386:15	subsequent 169:24 327:9	supposed 193:13 210:19 316:23 317:23	sutton 165:6,6 167:10,10 169:16,20 364:12	taken 165:19 166:12 169:16,20,23 184:8 198:17 227:8 232:4 252:23 263:3 270:17 318:18 359:13 364:21 370:21 395:19 415:21 425:4 426:13
student 168:14 181:24 229:19 261:10 263:12,20 264:2,8 264:16,20 317:24 335:15	subsidiary 391:14	supposedly 296:17 302:19 304:1 332:12	switch 304:19	takes 268:19 311:8
studentrun 228:9	substance 335:17	sure 170:1 177:24 188:21 189:1 191:5 192:16 194:3 206:19 208:12,17 212:3 213:19,22 214:11 224:12,19 226:16 229:17 236:23 237:9,11 238:1 240:5,14 241:25 243:20 244:21 248:24 249:9,17 251:23 252:23 254:9 270:8 271:14 272:13 273:14,22 274:19 274:22 279:24 280:23 284:10,23 285:2 289:10 292:20 307:21 310:14 311:10 328:15 329:13 331:7 334:23,24 336:23 339:16 343:18 347:4 357:18,19 358:8 360:5 361:4,17 371:3 372:18 391:25 403:14 409:23 410:6,20 412:11 413:5 417:15 421:23 424:19	sworn 169:8 271:7 374:6 425:22 426:9	talk 181:9 200:23 211:12 256:5 268:22 296:15 311:18 356:16 378:8 404:6,17 411:1
students 199:17 260:19 309:11 380:18 386:21 387:3,4 406:10 417:23 418:1 420:9,13	substantial 355:25		system 217:1,3 255:5,22 255:24 382:22 406:17	talked 263:12
studied 379:8 384:24 403:25 404:3	successful 165:3 170:5 192:7 231:20 246:5 247:5,13,16,18 248:3 265:7 285:20,24 399:22 411:14,16		systematic 383:23,24 393:10 393:13	talking 176:23 198:7 255:9 267:21,23 267:24 286:4 297:17 310:1,2 311:21 347:20 348:11 349:9 372:3 400:13,22 401:24 408:6 413:5
study 191:15 202:1,3,24 281:23 282:9,10 282:13,14,15,17 282:22 379:7 395:15	suffer 225:12		systems 229:4 383:1 384:17	talks 177:13,13 237:13
studying 200:2	suffering 207:11		table 422:8,22	tape 169:2 209:2 214:7 214:11,14,18 215:1,4,8 309:8 309:12 318:4 320:3,8 321:13 322:16 329:19
stuff 237:17 265:19,21 273:15,21 310:7 332:21 340:24 362:23 398:7,8	sufficiently 265:24		tails 234:22	
style 287:21,22	suggest 304:25 306:1,5,9 344:8		take 172:5,9,21,23 173:2,8,12 177:6 178:15 179:9 182:1 185:17,25 187:4 188:9,19 189:16,23,23 190:4,9,18,20 191:6 197:17 202:14 203:19 208:14 209:6 211:4,8,15 224:4 224:6 226:14 228:3 232:1 239:5 252:18 253:8 270:6 292:23 298:23 329:9 344:22 345:2 347:18,19 349:7	
subcontracted 384:19	suggested 304:22 305:4 306:6,10 349:21 349:22,23 350:22 351:10,10 352:3,4 352:19 421:5			
subject 198:7 213:6 278:7 325:8 349:14 381:24 387:4,8 419:2 423:2 425:5	suggesting 344:9 350:2			
subjective 393:24 406:17	suggestion 423:24			
submitted	suggestions 248:19			
	superficially 188:11 280:8 308:6	surface 182:24 196:16		
	supervisor 231:3	surveillance 341:4,6,8		
	support 401:10 402:23	suspect 186:17 189:5,10 190:21 221:25		

371:7 391:11	332:8 333:2	414:19 415:24	185:20 186:12,14	179:24 180:4,18
taped	337:12 342:9,12	testifies	186:15 191:19	180:19,22 181:4
214:23	346:13 347:23	169:8 271:7	192:2,3 194:16	183:2,7 185:9,19
tapes	376:23 379:23	testify	195:12,13 196:13	188:6 189:3,11,15
213:24 214:3,4,8	381:23 388:21	426:9	197:14,17,19	189:25,25 190:24
214:9 215:6,18	398:21 399:5	testimony	201:4,4 212:14	191:4,19,21
251:4 266:10	400:10 402:2,15	202:22 319:20	213:17 214:20,21	192:20 193:6,8
294:9 370:25	419:12	363:22 410:8	216:2,3 217:13,17	194:3 198:23,23
410:1	telling	425:4 426:12	218:10,13 221:6	198:25 199:6
taught	267:24 288:17	text	222:11 224:9,24	201:12 203:16,17
255:7 264:25	316:18 332:19	292:24	228:13,14 231:5	203:17 205:6
267:6,14 370:8	357:22	thank	235:18 236:15,17	206:21 207:3
384:18 388:22	tells	182:14 203:23,24	241:3,6 242:20	208:9,11 210:18
389:6 395:16	402:9	215:23 231:13	248:20 256:7	212:6 214:22,25
tax	templates	263:22 278:14	259:9,17 260:5,19	219:16 221:2
242:8,19,21,23	383:13	284:25 285:5	261:20 265:17	223:18 224:7,12
243:24 248:5	ten	286:22 293:7	266:13 268:21	225:10,19 226:19
255:4,22,24	262:3 386:7	321:20 343:23,25	269:2,11 272:12	226:22,25 230:18
teach	tend	403:7 424:4	272:13,16 273:5,7	233:14 235:6
284:16 384:20	213:23,24	theoretical	273:9 276:9	236:14 237:3,15
386:17,20,25	tenets	395:25 396:4	281:17 284:2,8	237:22 238:4,9
388:6,11,14 407:1	418:3	theory	290:2 296:14	239:5 242:6,25,25
407:6,25 408:2,5	tens	184:4 370:19	299:15,18 302:15	243:1,3,23 244:5
teacher	236:11	374:20,23 375:14	303:16 305:4	244:18,20 246:11
384:15,24 385:25	tenzin	393:21	306:12 309:9,11	246:12 247:11
386:1,17,20 387:1	373:8	therapist	310:5 311:2,12,20	253:1 254:5,7
teachers	term	190:14 269:15	312:3,10 315:3	255:1 256:5,18,25
386:16,24 387:6,7	174:24 186:12	therapy	318:12 323:13,14	257:5 258:4,6
teaches	250:25 251:1	208:10 254:13	323:21,22 324:20	259:13 260:6
385:25 394:24	265:11 266:5	thing	326:7,7 331:20	261:2,11,15 263:2
teaching	279:4	180:25 183:4	332:13,19 336:14	263:13 265:16
385:1,23 386:3	termed	193:4 196:18	340:13,23 345:2	266:6 267:20
387:2	388:1 390:18	202:21 213:20	346:9 347:13,14	273:21 274:12,14
teasing	terminology	217:21 222:3	347:16,21 362:20	274:15,17,24,24
261:21	285:17 286:4	230:24 238:15,16	362:25 369:3,5,6	275:16,23 276:20
technical	terms	242:19 244:5	370:20 371:24	279:17 280:25
292:14	186:9 254:13	245:10 259:18,23	376:5,6,17 377:18	281:15 282:7,9
techniques	263:20 264:20	267:24 270:1	378:15 379:18	283:8,8,9,16,21
260:3	268:25 302:19	281:25 303:13	380:7,8 381:13	284:5 287:4,4,5
technology	412:3	304:9 305:8 310:6	383:22 386:23	288:4,17,23,24
236:6 238:7 260:3	tested	310:11 316:12,16	388:23 389:7,9	291:10,16,17,21
282:23 411:21	383:3,10	336:13 349:8	391:10,10 392:18	292:19 294:5
tell	testified	357:11 382:17	393:9 395:15	295:11 304:13,17
172:15 175:8,18	202:10 295:17	399:9 413:5,23	397:14,21 398:5	305:1 306:7,11
176:4 181:2	301:2 304:15,21	421:22	399:24 400:5	309:7 311:8 312:7
194:14,17 198:3	308:9 310:12	things	401:17 403:9	312:7 315:12,15
198:19 223:6	338:11 345:20	170:25 171:1,2,9	420:9,20	315:19 319:17
252:11,14 264:17	347:8 349:19	171:13,16,18,20	think	320:13,22 321:10
284:4 285:22	369:25 372:17	176:19 177:9,17	170:14,15 171:6,8	321:23 322:10
291:14 320:8	395:24 396:11	181:4 182:23	172:5,8 176:17	328:17 331:17

336:8,10,17	172:4 188:15	time	403:14 413:5	419:25
337:20 338:1,13	190:21 192:6	169:3 170:16	419:8 421:3	tortured
339:19 342:25	247:22 254:7	175:2 179:9	423:16,19,25	207:10
343:8,21 344:13	258:2,3,4 262:24	189:11 209:2	today's	total
345:11 346:14,19	291:13,14 299:19	213:1 216:11	169:1	213:7
346:25 347:3,7	305:13 307:20	217:15 219:24	todd	track
348:15,18 349:10	347:23 375:20	228:8 229:10	277:5 281:10,11	215:5 369:7
349:12 350:10,18	379:1 400:17	233:5 238:20,25	told	trade
350:19,20,20	thoughts	242:4 244:3 245:7	169:12 175:8,17	170:6,21,23 171:3
351:2 352:20	377:8,18,19,20,23	251:8 252:18,24	176:4 211:3	171:4,10,14 172:6
353:8,23 355:17	390:12	255:3,10 262:1	283:12,14 293:23	172:14,18 173:4
357:21,23 358:25	thousand	263:13,16 265:8	303:12 312:4	173:12,18,19,22
359:4 360:5,25	243:2,4 385:25	285:1 293:6	322:14 333:3	173:23 174:2,7,13
361:4 362:20	thousands	295:11 308:24	337:15 341:19,21	174:21,23 176:17
363:3,7,19 364:10	211:10 236:4,9,19	311:24 312:11	342:4 346:9 348:3	176:20,21,24
364:11 365:3,6,23	236:25 237:8	319:15 321:5	348:5,17 349:19	177:2,7,15 178:8
368:14 375:12	238:6,19,24	322:5 329:19	359:15,18 360:21	178:12,14,14,19
376:10 377:10	threat	330:25 338:12	361:25 364:1,8	178:23 179:1,4,11
378:19 379:16	217:20	341:3 343:23	368:11 369:9	179:13,20,24
380:3 387:17	threatened	344:25 345:7	372:25 376:25	180:2,24 181:6,12
392:18 394:16	233:2	353:21 357:5,18	379:23 389:6,9	181:13 183:2,4,5
395:5,5 397:20	threatening	358:2 359:12	396:7 412:15	183:6,9,10,14,15
398:18,21,24	213:11,16 214:9	362:16 363:4,5	413:6 414:15	183:17,22 184:5,6
399:6 400:23	217:17 218:5,9	371:7,19 382:9,19	423:4	184:8,13,14
402:5,13 403:9,10	220:11	383:2 384:24	tomorrow	185:23,24 186:10
403:22 407:9	threats	386:7 407:11	421:10,13,14	186:18,19,21
409:21 410:18	217:22 218:1,12	410:2 418:10	422:11 423:5,22	187:1,8,9,18,24
412:15,21 419:25	218:16	419:18 426:14	tompkins	188:3,8 189:13,18
420:7,18 421:4,5	three	times	166:21	189:23 190:4,9,18
421:25 424:16	182:2,5 190:1	214:17 217:13	toni	190:20,24,25
thinkers	198:17,21 210:7	224:8,9 232:11	244:13 245:1	191:17,24,24
197:16	226:21 228:16	255:10 257:18	329:1,2 361:19,22	193:10,11,14
thinking	232:5 275:23	263:8 273:5	361:22 362:1,4,7	194:1,5,10,19
275:10 381:9,24	277:18 328:4	289:22 291:24	tonight	195:20,21 196:1,7
thinks	362:17 364:22	310:13 362:17	422:9	196:9,22 197:1,2
312:10 342:4	381:17,19	366:14 369:4	tony	197:12,20 198:1,4
362:19	threepage	tired	190:12,18,23	198:10,14,22
third	173:11,14	377:5	191:6 193:17	204:13 205:3,6,11
168:9 174:9	threw	title	tool	205:12,13,16,24
203:19,20 204:4	214:20	191:15 229:2	179:22,22 389:17	206:5,7,12 223:11
228:2 239:18,24	throw	241:17	389:18 395:25	236:9,10 237:2,5
244:5 313:23	421:24	titled	403:20	269:3 280:12,18
324:23	thrown	239:24	tools	323:1 396:22,25
thirty	222:12 368:22,24	today	388:6,11,14,16	397:15 407:9,12
236:7 238:8	369:5,6	242:5 244:23	389:19 405:1	412:17,20,21,24
thomas	thursday	266:5 321:18	top	413:1,4,6 414:20
167:4,13	165:19 166:17	344:5,10,18	178:21 180:3	414:25 415:1,8
thompson	tied	345:20 348:13,14	182:7 212:17	416:9,13,15,23,25
307:6	241:24 332:3	352:13 359:24	234:22 294:21	418:16,20,22
thought	388:25	376:11 389:18	313:17 401:4	trademarking

237:17	transmission	396:20 416:16	233:10,25 243:22	326:19,21 328:3
trademarks	405:18	417:1 426:12	251:25 269:25	350:1 374:3
237:13	transmitted	trust	276:5 285:22	380:25 388:7
traffic	264:25 267:6,14	252:8	288:10,10,11	393:25 396:10
343:2	267:18	truth	289:23 291:6	406:5 409:7
train	transmitting	297:25 298:9	298:18 312:23	414:18 415:5
284:12	269:23	426:9,10,10	313:22 326:23	419:5
trained	trash	try	327:21 328:4	ultimate
200:24 201:1	337:13,21 338:5	236:18 244:16	330:15 341:23	206:25 207:6,19
trainer	338:10	247:19,20 250:15	343:8 344:23	207:24 254:19
269:16	treat	268:18 285:15	345:4 351:10	394:5
training	190:16	286:10 298:10	352:3,18 353:13	ultimately
184:25 249:23	treating	344:10 346:2	362:17 367:19	170:14 185:12
252:23 253:9,11	393:19	350:22 399:5	369:20 391:9	207:12,20 235:16
253:15 255:17,25	tree	423:25	421:16 422:1	291:18,20 363:3
256:15 258:21,25	192:9,14,18,22,24	trying	twodimensional	376:5,19 414:11
259:6,7,20,25	193:18 401:1,19	182:10 190:18,20	383:18	um
260:7,10,15,17	treece	203:16 212:6	twohanded	170:1 276:5
261:3,7,9,13,18	353:21 354:5,17	225:10 260:5	375:6	371:24 417:15
262:20,21 266:25	treeces	306:6 328:15	twominute	419:13
268:2 279:22	351:15	338:13 355:17	208:15	unavailable
284:11,14,16	tremendous	362:10 408:4	type	421:15
trainings	207:11 383:15	turn	181:18 303:20	uncover
261:16 284:7	tribute	205:22 210:4	304:5,6 326:4	362:10
traits	204:17 419:21	213:21 215:9	349:1 378:3	uncovered
389:24	tried	240:6 294:6,14	383:16 392:9	334:13
trampled	217:13 228:17	314:9 324:22	409:19 410:17	undefined
354:21	377:3	327:16 365:2	types	317:9
trans	trim	374:10 393:3	388:1	underestimate
269:23	234:18	turned	<hr/>	236:21
transactions	trip	219:17 365:1,15	U	undergone
334:9	341:16	365:18,22 366:4	uh	385:24
transcript	triple	369:23	303:10	underinclusive
165:22 319:7	228:19	turning	uhhuh	174:6
321:19 322:16	trouble	365:12	175:16 176:7	underline
330:6,8 332:15	175:22 310:18	tutor	177:25 180:15	188:11,12 198:5
362:11 422:5	331:8 386:12	362:18	182:18 187:17	underlined
425:3 426:12	true	tutored	191:16 192:18	175:10 176:3
transferred	183:16,21,23	335:16	193:1 195:17,23	180:12 182:9,15
244:18	184:3,12 193:1	tvc	196:21 197:11,24	187:3 191:12
transformed	195:16 196:20	230:23	204:3,6 207:1	193:25 313:24
267:19	220:2 228:21	twenty	210:6 211:21	underneath
translated	239:11 259:2	419:3	213:12 216:10	389:5
275:18	295:21,22 298:9	twice	221:23 222:13	understand
translates	299:2,13,24 300:7	293:9	232:9 234:19	173:17,24 180:19
276:22	300:16 303:14	two	236:3 240:9 246:6	181:5 182:23
translation	304:1 313:10	181:7 186:8	250:4 254:14	199:5 207:5
330:20	325:22 334:10	199:10,10 207:10	258:23 291:15	221:20 232:22
translator	347:17 350:15,15	216:14,15 225:18	298:24 304:23	249:1 254:15
276:22,25	364:16 375:23	225:21 232:2	325:5,17 326:3,16	258:9 259:12

262:17 267:8	unions	274:12,20	vegetarianism	268:6,11,25 269:5
271:14 284:10	255:5 256:3,6,12	use	250:19	269:22 270:1
285:18 286:1,8,9	unique	171:21,23 178:14	verbal	326:10
297:15 300:17	175:20 176:8,10	178:16 184:23	218:15 249:1	violation
340:14 345:16,18	177:17,18 180:16	186:9 191:1 192:2	266:12 349:17	325:12 326:1,8
350:7 376:4 384:7	180:19,20 192:14	197:16,25 235:22	verbally	vip
388:13 393:12	192:19,23 195:7	242:19 250:16,25	213:16 221:24	252:23 253:9
403:14 406:14,19	195:18,20,22,23	267:21 284:15	272:24	261:13
414:9 418:8	195:25 196:3,4	290:11,13 318:20	verifiable	virus
understanding	379:16,17 387:13	333:22 348:6	352:10	219:23
170:11 173:25	389:24 413:7	370:15,19 380:7	verified	vision
183:1 184:16	united	385:16	303:16	247:12
193:21 195:6	165:1 277:7	user	verify	visualization
203:4,7 206:16	universally	290:17	228:13,14,16,17	383:19
242:20 244:12	191:14	uses	303:15	visually
258:10 262:23	universe	186:13 192:23	versed	382:21
266:4 268:10	210:10,14	264:16 381:17	405:5	vocabulary
282:4 288:20	universities	utilize	version	182:8
319:20 322:19	212:13 235:20	198:11 395:22	290:13,15	voice
336:25 337:6	university	utilized	vertical	293:13 331:6
340:3,7,9 342:2	277:8	267:19 378:13	284:8	volleyball
346:24 361:6	unknown	393:22 409:4	veteran	223:19 224:5
362:6 378:24	260:4	utilizing	222:22	335:15
381:8 383:12	unofficial	177:8 185:20	victim	volume
392:16 406:16	321:19	198:8 395:20	207:5,6	165:18
418:3,10,14	unpaid	397:13	victims	voluntary
understandings	241:13		206:25 207:20,24	207:18
390:9,10,10	unprobable	<hr/> V <hr/>	videoconference	vs
392:19,21 405:4	201:6	valid	165:23	165:5,12 166:5
understate	unprobablistic	300:11	videographer	<hr/> W <hr/>
290:16	199:23	valuable	167:22 169:1	wachenfeld
understood	unraveling	180:9 190:21	208:18 209:1	166:21
196:16 303:20,22	194:18	236:6 238:7	215:9,12 251:3,7	waged
304:2 313:18	unsure	246:13 312:9	270:12 271:3	361:23
335:24 336:6	194:6	value	294:8,11 329:14	wait
383:6 406:20	unterreiner	204:5,10 210:9,14	329:18 370:24	200:22 288:11
414:16	241:23,24	246:11,12 408:20	371:6 409:25	356:12,18 404:11
undertake	untrue	408:21 419:15	423:12 424:21	waiting
314:3,4,6	180:22	vanguard	videotaped	216:6,8
unesco	update	189:18 225:13	165:18	waived
277:6	331:13,15	268:4	view	336:21 351:17
unexpectedly	upgrades	vanity	201:25 202:2,4,19	waiving
244:1	241:20	279:4	266:7 415:20,21	326:17 327:19
unfortunately	upheld	variables	viewed	walk
232:23 422:12,24	312:8	381:15,16	220:2 415:15,19	214:15,16,16
423:20	uphold	various	viewing	216:6,9,11,12
unilaterally	259:10	233:19 282:22	390:4	394:6
356:22	upset	283:10 296:13	village	walked
union	225:19	vegetarian	293:13	214:25 216:13
256:7	upstate	250:18,19,20	violate	

walking 216:15	212:22 218:16 224:13,14,18	341:14 361:24 371:17 391:14	203:24 204:24 209:7 233:3 240:8	work 173:15 178:5,9
walks 214:17 268:5	232:22 236:22 237:20 246:25	409:21 410:18	246:8 254:4 270:15 278:5,11	198:21 199:15
walls 266:21	248:13 249:4 250:16 255:16	west 165:23	278:14 285:5 296:7 313:2	204:5,8 210:9,14
want 183:18 190:22	260:22 262:6 268:18 309:22	weve 170:3 199:17,18	314:10 327:4,22 330:18 336:18,22	228:24 246:14,14
207:7 217:11	312:14 313:19 326:20 339:8	199:25 200:9 201:3 236:11	343:25 350:9 351:18 353:3	260:18,23 279:16
222:2 223:9	347:11,12,12 368:2,19,23	248:18 251:16 281:17 284:6	355:3,7,15 366:3 373:21,24 374:11	291:19 292:13
230:20 234:24	376:13,19 385:17 385:18 386:4	322:25 325:16 366:5 400:17	378:7,9 380:12 393:5 411:8	303:24 325:10
236:1 248:2,24	387:12 388:19 393:11,18 394:3	421:23 422:1,19 423:4	422:20 424:23 426:9	358:5 384:6 392:7
271:14 281:15,25	394:20 396:14,17 401:5 406:3	whatsoever 368:1	woman 231:16,17 244:13	393:10 419:15
282:2 294:6 296:4	414:13 415:9 423:18	wherefores 320:2	261:8 262:19 336:10 363:5	422:25
300:24 301:7,14	ways 187:16 248:16	wherewithal 342:5	370:7	worked 219:3 230:7
303:5,24 344:8	276:5 306:10 372:3 377:22	white 232:12 235:7	womb 332:21	232:23 247:23
351:5 352:11	384:6 394:5 399:11 404:25	409:12,24 410:21	won 203:9,10,12	257:21 290:21,22
356:8 357:6 358:5	wealth 201:2 246:4	whys 320:1	wondering 311:2	290:22 291:7
358:9 363:22	web 290:2 415:13,15	wife 223:7,8 224:24	woods 240:21,24	294:10 337:10
398:20,20 399:2,5	website 200:3 208:10	268:2 269:14,24	word 176:10 193:24	339:15 340:10,11
400:19 402:20	414:17,20,23 415:7,22	wild 322:18	195:22 221:21 250:14 259:14	346:19,21,21
404:18,23 413:4	week 225:4,13 362:17	william 166:21	328:6 333:22 349:7 393:19,22	361:8 382:7
421:23 422:6	377:5 422:18	willing 246:14	403:10,12 414:8	384:15,22
424:19	weigh 171:25	willingness 408:20	wording 419:3	working 229:9 257:18
wanted 184:21 188:12	weighed 171:17	window 171:5 173:15	words 182:15,24 186:8	372:4 384:8 413:3
224:8 245:5	wellspring 165:8 167:15	205:7,7 389:25	187:15 188:2 196:11 214:5	works 242:15 268:21
291:13 302:2	went 174:2 188:14	windows 412:21	267:14 285:16 290:8,11 298:19	340:11 393:17
306:11,14 318:3	213:22 227:12 229:6 244:16	wishes 197:7	322:3 361:9 375:18,25 394:1	406:2
351:3 358:6 364:1	245:9 254:24 263:1 265:18	withdraw 248:10	396:16,19 397:12	workstudy 229:16
364:9 400:21	273:25 311:9	withdrawn 410:25	wordtype 365:8	world 199:19 204:11
412:11		witness 168:2 175:6		228:15 246:5,22
wants 268:4 283:17				247:1,2,3,12,19
388:25				250:2 260:13
warn 189:1 351:13				406:18
warning 188:24 218:22				worlds 201:2
washington 291:8				worry 386:13
watch 218:13,21 221:3				worth 295:11 311:17
233:15				write 187:25 189:16
way 173:6 179:17,24				213:25 232:19,19
180:18,19 182:25				276:5,6,7,11,11
184:11 188:13,18				277:3 377:8
189:3 191:2				378:17 381:23
192:20 194:8				417:19
				writing

183:11 187:20	338:16 343:5,5	<hr/> 0 <hr/>	386:10 401:12	174:16 239:5
199:13 232:20	367:7,10 379:16	00	402:10 411:16	263:24,25 264:1
254:11 275:21	395:13 403:24	344:18 421:9,12	421:12 422:11	270:11
377:15 382:7	416:6	422:9,11	10	153
written	year	000	208:19 209:2	228:4 380:21
208:6 213:15,18	172:9,19,21	199:17,25 200:4,7	326:15 327:6,17	16
249:1 254:23	216:13,15 222:22	200:9 201:1	327:24	382:9 420:1
275:6,13 276:4,13	226:18 228:3,4	225:16,17,21	100	1633
277:17,18,24	229:1 280:22	243:1 281:1	166:22	167:17
280:11 302:17	289:4 308:21,23	382:10	100196708	169
328:10 332:17,18	338:14 369:20	00001	167:18	168:3
364:25 377:16,17	371:22 380:19,21	321:18 329:25	11	16day
382:1,13 412:22	yearandahalf	00329	228:1 242:8 251:8	187:11 284:21
415:8	220:9	168:12 245:17	327:16,23,25	371:18
wrong	yearbooks	04	328:4 380:10	17
265:1	226:24	168:13	110	227:13 228:3
wrongdoings	years	0442	165:14	271:4 330:12
306:7	173:15 190:1,2	294:19	12	371:7 380:19
wrongfully	198:20 216:14,15	0452	165:19 166:17	387:25 410:3
181:11	225:18,21 236:7	294:17	168:11 210:13	17th
wrote	238:8 243:3	0453	214:16 216:12,15	380:15
187:10,12 193:4	275:23 277:18	297:1	234:5 245:13,16	18
199:1,5,6,9,10	288:10,11 292:4	0455	245:20 249:11	230:14 253:12
208:4 212:7 232:7	306:18 376:25	294:20	270:13 374:16,17	1800
232:21 238:15	377:10 385:25	053	376:8,10,23	391:1
245:24 246:1	406:24 420:21	296:23	382:12,18 401:2,7	1980
248:17 265:13	yell	06cv01051	401:8,19 402:8,13	226:23
277:13 281:9	216:17,20	165:4	402:16 411:16,20	1980s
382:10 409:3,10	yelled	07039	411:25 412:16,19	370:1
411:19	216:3 217:17	165:24	413:14 414:1,16	1982
<hr/> X <hr/>	yesterday	07068	415:3,6 417:5,10	384:15
xi000918	169:13 170:2	167:14	417:12,13,16,23	1984
426:23	175:3 215:21	07102	418:1,7,8,12,15	230:6 384:15
<hr/> Y <hr/>	255:23 263:11	166:23	418:21 419:1	1987
yeah	276:20 335:4	079321047	425:4	230:6
189:24 191:5,11	345:3 363:23	167:5	12065	1991
195:2 220:24	372:17 395:24	079621981	169:7	409:2
222:24 229:24	409:11 413:3,4	167:9	12parameter	1998
230:22 236:14	414:15 415:24	08	383:17	242:8
253:14 257:11	423:16	329:19	12point	1st
266:22 274:24	york	<hr/> 1 <hr/>	210:9	324:21
288:24 296:5	167:18,18 169:7	1	13	<hr/> 2 <hr/>
298:14,21 301:18	230:7 242:8,14	168:13 169:2	229:22 245:13,14	2
302:24 303:5	248:5 253:15	175:25 176:1	245:15 324:17	165:4 194:25
304:20 305:18	254:17,20 274:12	192:10,11,12	384:14	195:1 209:2
310:22 311:8	274:20 355:24	251:13 264:21	14	236:21 253:16,18
319:25 320:11,20	<hr/> Z <hr/>	270:11 271:4	234:4,6,9 244:7	329:15 386:11
324:20 331:7	zeroes	294:11,12 324:19	263:24 292:22	401:12,16 402:10
	321:23	324:24 386:7,9,9	294:18	419:3
			15	

20 243:1 270:13 386:17,18 419:9 420:22,24	239 168:10	37 411:7	241:5 294:12	8
200 331:22 392:6	245 168:12	38 417:22	500 166:16 167:4	8 195:14 196:19 199:17 200:19,20 200:22 205:22 214:16 216:12,15 226:17 258:17 326:13 398:24,25
2000 401:2,19	25 393:3,8 394:12 405:20	39 379:3 418:24 420:2,15	5380800 167:9	80 226:25
2003 168:8 169:25 208:23 216:18 223:21 238:21 239:1 374:7,9	251 168:13	4	54 251:8	81 227:1
2004 168:19 251:13 252:21 253:1,13 254:1 308:21,24 330:15 340:4,18 341:1,1,3 342:23	26 393:4 394:12 405:20	4 166:22 210:5 222:22 253:22 258:18 261:1 371:7 382:10 386:11,12,12 401:3 402:10	5497370 167:5	82 226:19 227:1
2005 244:7 308:24 338:15 340:5,18 341:1,4 342:23	264 168:15	40 208:19	55 193:5 238:13 330:2	8331100 167:18
2006 239:8	27 406:12	400 199:25 200:4,7,9 201:1 384:3	555 312:25	9 166:18 169:4 239:8 273:21 312:23 319:16 326:14 374:10,12 421:10 422:10
2007 324:19	278 168:24	41 426:7	56 209:2	90 383:2
2009 165:19 166:17 169:1 425:4	28 232:6 233:2 408:10 409:2	43 233:22	57 330:2	973 165:24,25 167:5,9 167:14
208 168:8	281 168:25	44 166:18 169:4 234:4,5 423:13	570 165:23	9943510 165:24
21 236:2 240:7	285 168:4	45 329:15	5972508 167:14	9943621 165:25
212 167:18	3 168:13 169:7 258:17 329:19 386:11,12 401:16 402:2,7,7,10	46 424:22,25	5th 204:17	
215 168:23	30 173:15 198:20 231:7,12 243:1 344:6 376:25 421:10 422:10	49 294:11	6 200:22 255:2 262:5 324:22,25 325:1 371:7 382:11 398:24,25 400:16	
22 168:8 208:23 238:21 239:1 253:13 426:7	32 330:2	4th 401:7,8	60 277:10	
221 168:23	324 168:17	5 200:23 211:19 212:16 222:19 226:7 281:1 296:12 329:19 344:6 398:24,25 402:3,7,10 410:3 423:13 424:22,25	600 228:3 380:20	
222 168:24	330 168:19	50 225:16,17,21	65 167:13	
22nd 239:10 374:7,9	34 297:2 330:3		7 344:18 402:14 406:24 421:9 422:9	
23 168:19 330:15	345 168:4		70 277:19	
	36 411:7,9 412:7 413:18 414:3		700 312:25	
			7500 188:18	